



NUCLEAR ENERGY INSTITUTE

Alexander Marion  
EXECUTIVE DIRECTOR  
NUCLEAR OPERATIONS

September 10, 2008

Ms. Christiana Lui  
Director, Division of Risk Analysis  
Office of Nuclear Regulatory Research  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Ms. Lui:

Thank you for your August 7 letter requesting plant specific information for NRC's evaluation of existing plant sites against the updated probabilistic seismic hazards estimates. We recognize the importance of conducting these evaluations in a manner that allows comparisons involving similar methodologies. The obvious challenge is to develop an evaluation process that allows a reasoned comparison of probabilistic hazard estimates with seismic parameters used in margins analyses and probabilistic risk assessments conducted under Individual Plant Examination of External Events program (IPEEE) as well as deterministic methods allowed by Regulatory Guide 1.60 and plant-specific safety analysis reports. In that regard, we are working with the Electric Power Research Institute (EPRI) to conduct such evaluations. We suggest that that technical research exchanges on the methodologies be conducted under the auspices of the EPRI-NRC Memorandum of Understanding (MOU).

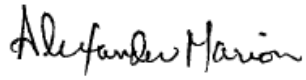
In 2006 we provided to the NRC updated hazard estimates for 28 sites. In addition, EPRI has completed probabilistic seismic hazards estimates for most of the remaining nuclear plant sites in the Central and Eastern United States (CEUS). The probabilistic seismic hazard estimates have been developed with the Cumulative Absolute Velocity (CAV) filter consistent with the state-of-the-art methods outlined in Regulatory Guide 1.208. We have requested that EPRI compare the updated hazard estimates with the EPRI Seismicity Owners Group (SOG) hazard data developed in 1989. We intend to discuss these results with the industry and request the affected utilities to conduct further evaluations to determine potential implications to the plant site design bases. We expect to have this information by the end of November, 2008, although it is not clear at this point the amount of time that will be required by the utilities to conduct their respective evaluations. We will provide that further information when it is made available to us.

In closing, we request a public meeting be scheduled in late November or early December 2008 to present the data and the results of our efforts. We look forward to working with you and your staff

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on this important activity. If you have any questions or wish to discuss this further, please contact me at 202.739.8080; [am@nei.org](mailto:am@nei.org) or Kimberly Keithline at 202.739.8121; [kak@nei.org](mailto:kak@nei.org).

Sincerely,

A handwritten signature in black ink that reads "Alexander Marion". The script is cursive and fluid, with the first name "Alexander" and last name "Marion" clearly legible.

Alexander Marion

c: Ms. Jennifer Uhle, US NRC-RES  
Mr. Jack W. Foster, US NRC-RES