

## Staff Responses to Public Comments on DC/COL-ISG-007

### “Assessment of Normal and Extreme Winter Precipitation Loads on the Roofs of Seismic Category I Structures”

#### Comment Source

NEI Letter Dated October 15, 2008 (ML091520086).

#### Specific Comments and Recommendations

On page 4 under “Issues,” there is a bullet stating that “an additional site characteristic for evaluating extreme load winter precipitation events should be provided to account for additional weight if at least part of the 48-hour PMWP falls as frozen precipitation.” Subsequently, the ISG states that “roof loads due to the extreme winter precipitation event shall be the higher roof load resulting from either the extreme frozen winter precipitation event or the extreme liquid winter precipitation event.” The guidance does not define how the additional site characteristic should be determined and used, and it is not consistent with the rest of the ISG. We recommend the subject bullet on page 4 be deleted.

#### NRC Comment Resolution

The staff agrees that the indicated sentence in the original version of the ISG is confusing. The issue discussed in this sentence concerns identifying as an extreme environmental load the circumstance where additional frozen precipitation falls on top of an existing normal live load winter precipitation snowpack. The draft ISG expressed this circumstance in the “Issues” section as additional weight on top of an existing normal live load snowpack if at least part of the 48-hour PMWP falls as frozen precipitation. However, the subsequent draft ISG section entitled “Proposed Interim Staff Guidance” expressed this circumstance as the weight of the antecedent snowpack resulting from the normal winter precipitation event plus the weight from the extreme frozen winter precipitation event. Subsequently, instead of deleting the second bullet under “Issues – 2. Extreme Load Winter Precipitation Events,” the staff is changing this bullet to read:

*Extreme load winter precipitation events should also consider the situation where additional frozen precipitation falls on top of an existing normal live load winter precipitation snowpack.*