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Proposed Generic Communication - Draft Generic Letter on Seismic Risk Evaluations for Operating Reactors

Comment On: NRC-2011-0204-0002

Proposed Generic Communication; Draft NRC Generic Letter 2011-XX: Seismic Risk Evaluations for Operating Reactors

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RULES & REGULATIONS
SECTION

8

General Comment

See attached file(s)

Attachments

Comments on draft GL-2011-XX

SUNSI Review Complete
Template = ADM-013

E-RFDS = ADM-03
Call = R. Montoy (Kam)

I strongly support issuing this Generic Letter in a form similar to the draft available through NRC's ADAMS, accession number ML111710783. However, I have the following comments for you to consider.

Regarding the section titled "Requested Information," paragraphs 3 and 4:

I believe there is opportunity for confusion between the safe shutdown earthquake (SSE) and the ground motion response spectrum (GMRS) developed from new site-specific hazard curves. Per section 5.4 of Regulatory Guide (RG) 1.208, I understand the SSE to be a ground motion spectrum characteristic of the site which is in the current plant licensing basis, and to which certain structures, systems and components are designed to remain functional. It is not a characteristic of the existing plant design. I interpret the site-specific GMRS mentioned in paragraph 3 to be analogous to a site's SSE, but a spectrum developed per RG 1.208 that may differ from the SSE because it is based on the current, best available seismic source, attenuation, and site response information. Some readers might translate "SSE" in paragraph 4 to imply a new SSE based on the newly derived GRMS. A distinction between these two might be enhanced by simply changing the wording of paragraph 4 to read: "the SSE, in the current licensing basis, in tabular and graphical format."

Regarding the section titled "Required Response," second bullet:

This bullet calls for a response to items 2, 3, and 4 within 180 days. This includes the statement, "In its response, where applicable, each addressee is requested to identify its selected assessment approach (i.e., SMA or SPRA)." I do not see how the information requested by items 2, 3, and 4, which relate solely to seismic hazard curves and ground motion response spectra, relate to the addressee's choice of whether they perform an SMA or SPRA. I suggest deleting the second sentence from this bullet.

Regarding the enclosure, "Development of Requested Information," Step 2, second bullet:

First, I am pleased to see that this paragraph asks the western plants to develop updated, site-specific PSHAs. I am aware of at least one plant in the Western United States with a licensing basis that relies on PSHA results that would be considered insufficient by today's standards. That particular study does not meet all of the high-level requirements in section 4.1 of ANSI/ANS-2.29-2008, "probabilistic seismic hazard analysis." These high-level requirements are criteria for judging the adequacy of an existing PSHA for future use. Second, I suggest you consider adding to this paragraph ANSI/ANS-2.29-2008 as a standard to be followed in developing a PSHA.