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

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General Comment

One of the primary drivers for the generic safety issue is an observation that the new reactor designs that are co-located at sites with current operating plants have a significantly higher and different spectral shape than the current reactors. This is not surprising since the new reactor designs are anchored (effectively the peak ground acceleration(PGA)) using the NRC performance-based guidance for new reactors at 1E-5/year, while current operating plant safe shutdown earthquakes using their accepted regulatory modeling approach have a PGA at about 1E-4/year.

Thus, the claim that this is a significant issue is incorrect since it is the direct result of the use of a new and different model with a new "anchor" point for the model. This was done to ensure that new reactors meet the Commission expectation, as stated in numerous Commission SRMs, that the new reactors be "safer" than current operating reactors. Nowhere has the NRC indicated that the regulatory guidance for the current operating plant seismic design is flawed and the new reactor performance-based regulatory guidance must be used. In fact, as I have indicated in other comments, this expectation for new reactors was purposely not imposed on current operating reactors, since their design still provides adequate protection of the public and is still consistent with the Commission's safety goal policy statement.

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Cde - K. Moralez (Ham)*