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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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## Submitter Information

**Name:** Michael Peck
**Address:**
PO Box 2331
Avila Beach, CA, 93424



## General Comment

See attached file(s)

## Attachments

Draft NRC Generic Letter

SUNSI Review Complete
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Add = K. Manoly (KAM)

The Draft NRC Generic Letter (GL), "Seismic Risk Evaluations for Operating Reactors," was incomplete because of inconsistencies with the NRC policy on operability as described in NRC Inspection Manual Part 9900: Technical Guidance Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety (Attachment to RIS 2005-20, ML 0735313460).

The seismic qualification of plant equipment ensure that each structure, system and component (SSC) important to safety would be capable of performing the intended functions assuming the most severe natural phenomena (earthquake) historically reported for the site and surrounding area. The plant design basis (as defined by 10 CFR 50.2, 10 CFR 50, App A, General Design Criterion 2, "Design Bases For Protection Against Natural Phenomena," and 10 CFR 100, App A) required each license holder to develop and uses a deterministic safe-shutdown earthquake to bound the plant specific seismic safety analysis. The Attachment to the Draft GL, "Development of Requested Information," Steps 2 and 3, request each utility to develop and compare a performance-based ground motion response spectrum to the deterministic safe-shutdown earthquake. If the ground motion spectrum is greater than the safe-shutdown earthquake, then this new information brings into question if the plant seismic safety analysis continues to be bounding. As described in the Part 9900, Section 4.5, "Circumstances Warranting Operability Determinations," the operability process should be entered following discovery this unanalyzed condition. Also the Part 9900, Appendix C, "Specific Operability Issues," Section C.1, "Relationship Between the General Design Criterion and the Technical Specifications," requires entry into the operability process if a licensee determines if the plant no longer meets the requirements of General Design Criterion 2.

The draft GL stated that the NRC will evaluate the information submitted by the addressees and may determine whether there is a need to take additional action. The operability process provides assurance that plants can continue to operate safety pending completion of longer term corrective actions. As discussed in Part 9900, the operability process should be immediately entered once a licensee develops information indicating that the plant seismic safety analysis may no longer be bounding or if a licensee no longer meets the requirements of General Design Criterion 2. The operability process will ensure that adequate margin exist and provide a reasonable assurance that plant SSCs would be still be capable of performing the specified safety functions given the increase in seismic demand.