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

**Comment On:** NRC-2011-0204-0011

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

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## General Comment

See attached file(s)

## Attachments

GI-199 Comments

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Add = K. Monoly (Kam)

FirstEnergy Nuclear Operating Company (FENOC) appreciates the opportunity to provide comments on the draft generic letter on seismic risk evaluations for operating reactors (ML111710783). FENOC endorses the comments made by the Nuclear Energy Institute (NEI) on December 15, 2011, on behalf of the nuclear industry.

Based on our review of the draft generic letter together with the *Near-Term Task Force (NTTF) Recommendations for Enhancing Reactor Safety in the 21<sup>st</sup> Century* report, issued July 12, 2011 (ML111861807) and commission papers SECY-11-0124 and SECY-11-0137, we share NEI's concern that the lack of coordination among the individual recommendations could lead to a very large expenditure of resources while delaying deployment of desired safety enhancements.

Therefore, we support the integrated, performance-based approach to optimize the implementation of lessons learned from the Fukushima Daiichi accidents that NEI is developing. Instead of waiting several years to complete the very detailed seismic hazard analyses described in the draft generic letter, we could identify an Integrated, Diverse and Flexible Mitigation Capability Strategy (FLEX) that could be implemented in the near term to mitigate the effects of extreme natural events. This FLEX approach could be implemented to provide water and an electric power generating source; to have the capability to inject cooling water into the core and the spent fuel pool; to provide power for instrumentation; to remove heat from the core, the spent fuel pool, and containment; and could include other functions or equipment to protect the plant and mitigate beyond design basis external events.

In parallel with these efforts to deploy enhanced mitigating capabilities, we agree that it would be prudent to take the following additional actions relative to seismic hazards:

- Perform walkdowns to identify vulnerabilities.
- Verify that the conclusions of the Individual Plant Examination of External Events (IPEEE) remain valid, considering any plant modifications that may have been made since the IPEEE was performed.
- Establish an improved process for evaluating the effects of new information and methodologies for estimating seismic hazards.

The highest priority should be to determine the most effective ways to use the FLEX strategy to mitigate the effects of loss of all AC power and/or ultimate heat sink. From a seismic standpoint, this would include identifying the most seismically robust locations in the plant to make connections to provide electrical power and water necessary to maintain core cooling, spent fuel pool cooling, and

containment integrity. The seismic walkdowns and IPEEE verifications identified above will provide additional assurance of the plants' abilities to withstand large earthquakes and should be performed expeditiously, as long as those efforts do not delay implementation of the FLEX enhancements.

The process described in the draft generic letter will not enhance safety in the near term, and is, in fact, likely to divert resources from near term safety improvements. FENOC agrees with NEI's request for the NRC to withdraw this draft generic letter in favor of an integrated approach for implementing Fukushima Tier 1 recommendations using the FLEX strategies, including seismic walkdowns and IPEEE verifications, which the industry fully supports as a means to achieve real, near term, safety enhancements. This approach will also allow time for the industry to work together with NRC to develop a long-term plan for addressing new seismic information, in an integrated fashion.

If you have any questions, please contact Robin Ritzman at 330-436-1484.