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December 15, 2011

Ms. Cindy Bladey, Chief
Rules, Announcements, and Directives Branch (RADB)
Office of Administration
Mail Stop TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Response to Request for Comments – “Proposed Generic Communication; Draft NRC Generic Letter 2011–XX: Seismic Risk Evaluations for Operating Reactors” (Federal Register Notice 76FR54507, dated September 1, 2011, Docket ID NRC-2011-0201)
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This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments related to “Proposed Generic Communication; Draft NRC Generic Letter 2011–XX: Seismic Risk Evaluations for Operating Reactors,” which was published in the Federal Register (i.e., 76FR54507, dated September 1, 2011).

The NRC is proposing to issue this generic communication requesting that applicable addressees evaluate their facilities to determine the current level of seismic risk and to submit certain information to facilitate the NRC’s determination if there is a need for additional regulatory action.

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this subject and offers the following comments for consideration by the NRC.

Exelon is concerned that the time frame indicated in the draft generic communication for performing either a *Seismic Margin Assessment (SMA)* or *Seismic Probabilistic Risk Assessment (SPRA)* might be burdensome when considering: 1) the hazard assessments required, 2) the need for additional guidance and standards, and 3) the actual time and resources needed to support such an effort. Exelon also considers that it is overly conservative to compare the *Ground Motion Response Spectra (GMRS)* to the site design *Safe Shutdown Earthquake (SSE)* spectra. Exelon believes that the *Individual Plant Examination of External Events (IPEEE)* program can be verified and updated, as appropriate, to reaffirm that plants have significant capacity to withstand seismic events beyond the original design basis.

The application of Regulatory Guide (RG) 1.200, “An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities,” and the associated American Society of Mechanical Engineers (ASME) Probabilistic Risk Assessment (PRA) Standard represents a level of pedigree well beyond that needed for the stated regulatory decision cited in the purpose of the draft generic communication (i.e., the determination of the safety significance of the new seismic information). RG 1.200 and the associated ASME Standard have been developed to support increased pedigree of PRA models when used as a

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basis for requesting changes to the current licensing basis at a plant. Exelon does not believe that this level of technical adequacy is needed to support a general determination that the safety significance for nuclear power plants within the U.S. fleet resulting from the new seismic hazard information is sufficient. Further, the seismic PRA results will not be used in the same manner as that intended by RG 1.200.

Previous probabilistic and deterministic seismic analyses support the general NRC conclusion that plant seismic capacity of the U.S. nuclear power plant fleet can withstand seismic events beyond the seismic design basis. In general, risk margin has been demonstrated to exist beyond the design SSE, and therefore, the development of a seismic model with detail to meet the RG 1.200 requirements will increase the time and resources required to support the determination of safety significance. Therefore, Exelon suggests that the NRC reconsider making reference to RG 1.200.

In addition, Exelon fully supports the comments submitted by the NEI on behalf of the industry in a letter dated December 15, 2011, pertaining to this subject.

If you have any questions or require additional information, please do not hesitate to contact Richard Gropp at 610-765-5557.

Respectfully,

A handwritten signature in black ink, appearing to read "Michael D. Jesse", with a stylized flourish at the end.

Michael D. Jesse
Director – Licensing and Regulatory Affairs
Exelon Generation Company, LLC