Attachment 3

Comments on Recommendation 2.1 and 2.3

Other External Hazards

This proposed information request was added in late December 2011 as a new Tier 1 item. It includes all other applicable hazards, such as severe winds, tornados, hurricanes, ice and snow storms, forest fires, dust storms, etc. These activities will involve many of the same company personnel that are involved in the other recommendation 2.1 and 2.3 activities, and the other external events (beyond seismic and flooding) are not directly related to the lessons learned from Fukushima. The amount of work being imposed on the industry and NRC technical staffs is already significant. In the industry's proposed prioritization scheme, the re-evaluation of these other external hazards would be considered a lower priority item in any prioritization scheme for Fukushima-related work.

Neither the industry nor the NRC has had sufficient time to evaluate what effort will be required to prepare evaluations of other external events using the methodologies applicable to new plants. There are a large number of other external events, and the applicability of any one of them to any particular licensee is highly site-specific. Not all of the other external events have been evaluated as part of new plant projects. This raises uncertainty over the scope of the task, and additional time will be required to determine if there are new applicable and appropriate methodologies, develop guidance, and implement pilots prior to industry-wide application.

A phased approach, with the start of the work on the other external events being delayed, will enable the industry to form an appropriately staffed technical team to address the numerous issues encompassed by this activity. This will include the development of guidance, training and the performance of evaluations. This could be considered a separate regulatory activity outside of the Fukushima response projects.