

# PUBLIC SUBMISSION

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 Guidance on Performing a Seismic Margin Assessment

**Comment On:** NRC-2012-0209-0001  
 Guidance on Performing a Seismic Margin Assessment

**Document:** NRC-2012-0209-DRAFT-0003  
 Comment on FR Doc # 2012-22174

9/10/2012

77 FR 55510



## Submitter Information

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**Government Agency Type:** State

**Government Agency:** Vermont Department of Public Service

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## General Comment

See attached file(s)

## Attachments

VPD Comments on Guidance on Performing Seismic Assessment

SUNSI Review Complete  
 Template = ADM-03

E-RIDS = ADM-03  
 Add = C. Gratto.1 (CDE1)



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October 10, 2012

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: Comments to Docket ID NRC-2012-0209, JLD-ISG-2012-04  
Guidance on Performing a Seismic Margin  
Assessment in Response to the March 2012  
Request for Information Letter

Dear Ms. Bladey:

The Vermont Public Service Department (Department) hereby submits its preliminary comments on the NRC Draft Interim Staff Guidance, JLD-ISG-2012-04, *Guidance on Performing a Seismic Margin Assessment in Response to the March 2012 Request for Information Letter* ("Draft Guidance").

The Department does not have any comments at this time addressing the technical nature of the seismic analysis that nuclear power stations must conduct based on the information provided. However, we are concerned that the Draft Guidance does not identify opportunities for stakeholders, such as the State of Vermont, to review the analysis substantively while it is in process, such that we could provide comments in a timely fashion before the product was submitted to the NRC. Also, it is our understanding that when this analysis is submitted to the NRC by the licensee, there is no opportunity for the State to provide its review and comments of the seismic analysis at that time either. It appears there is no part of the Draft Guidance that provides the states, or other stakeholders, a way to provide comments either as the analysis proceeds or when it is submitted to the NRC. Having a defined and transparent comment procedure has the potential to greatly improve the assessment process. Vermont believes the opportunity for review and comment is vital to the process, and urges the NRC to include a mechanism for comment on the draft analysis so that the licensee could review and respond to concerns, and a comment period on the final product submitted to the licensee to the NRC.



Thank you for this opportunity to comment.

Sincerely,



Sarah Hofmann  
Deputy Commissioner