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General Comment

See attached file(s)

Attachments

Comments on Guidance for Integrated Assessment

SUNSI Review Complete
Template = ADM-013

FRIDS = ADM-03
Call = E.E. Miller (EXM)

NRC Docket ID NRC -2012-0222:

**Comments on Guidance for Performing the Integrated Assessment for Flooding
(JLD-ISG-2012-05, Rev. 0 draft)**

1. Section 1 – Introduction – Recommend changing the second sentence to read: “Using the results of the site specific flood hazard reevaluations, the Integrated Assessment evaluates the total.....”
2. Section 1 – Introduction – third paragraph – “flood hazard” should read “flood hazard(s)” since more than one flood hazard may be evaluated.
3. Section 1 Introduction – third paragraph – It should be recognized that the site flooding evaluations (documented in calculations) could be more conservative (higher flood levels) than what may be stated in licensing basis documentation (such as the FSAR). Inspections performed in response to the 50.54f letter, Recommendation 2.3, may also have been performed based on the higher flood levels.

It is assumed that if the evaluated flood levels (documented in site calculations) are higher than what is stated in current licensing basis (CLB) documentation, the evaluated flood levels (even though they may be higher than the CLB levels) can be used to determine if the reevaluated hazard is bounded by the design basis flood at the site. Is this correct?

4. Section 1.2 Scope of Integrated Assessment - first sentence – it is not clear what the first sentence in this paragraph is attempting to convey. At the end of the sentence which says “....due to the status of flood protection features”, it could be revised to read “....due to the potential impact on flood protection features during postulated flooding events” – please clarify sentence accordingly.
5. It is recommended that a summary level outline or an overview section (1 or 2 pages) be included in the guidance document, which identifies the requirements that must be fulfilled to complete an Integrated Assessment in accordance with this guidance document. Can a generic template be developed for submitting an approach for developing the integrated assessment? Is this the intent of Section 8 of this document?
6. The guidance document should contain a section dedicated to “Criteria for Identification of Vulnerabilities” since licensees are expected to submit an approach for developing an Integrated Assessment Report, including criteria for identifying vulnerabilities, within 60 days of the date of the NRC’s issuance of this guidance document.
7. Section 2.3 - NTTF Recommendation 2.1 Flood Hazard Reevaluations – Is the re-evaluation of a flood hazard required even if it is obvious that there is significant

physical margin available? For instance, if current licensing basis for the PMF on streams and rivers shows that the site is 200 feet above these maximum flood levels, is it necessary to reevaluate this flood hazard using present day regulatory guidance and methodologies? In lieu of a detailed evaluation, would it be acceptable to simply provide a general discussion stating why this flood hazard would not be of concern, given the physical margin available?

8. In the “scenario based” evaluation of mitigation capability (Section 7.2), it must be demonstrated that there is high confidence that key safety functions can be maintained. Are additional single failures required to be postulated to demonstrate that key safety functions can be maintained? As an example, for internal flooding events, the design basis for the station may require that an additional single failure be postulated to demonstrate that the unit can be safely shutdown and maintained shutdown following the flooding event. What criterion is expected to be applied for the external flooding events?
9. In the “scenario based” evaluation of mitigation capability (Section 7.2), it talks about use of PRA to evaluate reliability of active components. Use of PRA is typically for operability considerations, not design basis considerations. Is the evaluation of mitigation capability to be eventually included in the station licensing basis documentation as part of the station flooding design basis or are these evaluations viewed more as operability evaluations.
10. Section 8.a) – Is the “integrated procedure” referred to in this section really the “method of evaluation” used to access the integrity of the plant during a postulated flooding event? Please clarify.
11. Section A.1.1.2 – The last sentence states: “Suitable instrumentation is being used to obtain information on the performance and condition of the structure”. Need to clarify what is meant by this statement. Are you referring to level instruments to monitor inleakage? If so, the statement should be revised accordingly.
12. Section A.1.1.3 – first bull dot – it states that “all sizes have been tested to withstand hydrostatic seal pressures...”. We should not have to test all sizes. The larger, bounding seal configurations are tested and the results can be applied to the smaller seal configurations – please clarify.
13. Section A.1.1.3 - sixth bull dot – it states that plugs and seal should be “adequately resistive to fires, corrosive fluids, UV and radiation” . Recommend adding, “as applicable” at the end of this sentence since not all seals and penetrations require these additional protective features.
14. Section A.1.1.4 – Suggest clarifying that this section is applicable if storm drains are credited in the flooding evaluations.