As of: November 20, 2012
Received: November 19, 2012
Status: Pending_Post
Tracking No. 1jw-822e-wdp6
Comments Due: November 21, 2012
Submission Type: Web

PUBLIC SUBMISSION

Docket: NRC-2012-0247
Implementation of Regulatory Guide 1.221 on Design-Basis Hurricane and Hurricane Missiles

Comment On: NRC-2012-0247-0001
Implementation of Regulatory Guide 1.221 on Design-Basis Hurricane and Hurricane Missiles

Document: NRC-2012-0247-DRAFT-0002
Comment on FR Doc # 2012-25927

10/22/2012
77 FR 64564
(1)

Submitter Information

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General Comment

See attached file(s)

Attachments

MFN 12-126

SUNSI Review Complete
Template = ADM - 013

E-RIDS = ADM-03
Add = A. Cubbage (AEC)

GE Hitachi Nuclear Energy

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MFN 12-126

November 19, 2012

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

Via Federal Rulemaking Website

Subject: Comments: U.S. Nuclear Regulatory Commission; NRC-2012-0247, Proposed Interim Staff Guidance, Implementation of Regulatory Guide 1.221 on Design-Basis Hurricane and Hurricane Missiles, 77 Fed. Reg. 64564 (October 22, 2012)

Dear Ms. Bladey,

GE Hitachi Nuclear Energy ("GEH") and Detroit Edison, as the ESBWR Design-Centered Working Group, provides comments on the subject request for comment. As explained in the Federal Register Notice, the proposed Interim Staff Guidance DC/COL-ISG-024 is to supplement the guidance regarding application of NRC Regulatory Guide 1.221 for hurricane missiles.

Specific comments are provided in Enclosure 1. Please contact me if you have any questions regarding the ESBWR Design-Centered Working Group comments.

Sincerely,

Patricia L. Campbell

Patricia L. Campbell

Commitments:

None.

Enclosure:

1. Comments on Proposed DC/COL-ISG-024

CC: NRC-2012-0247
M. Brandon, Detroit Edison

Comments on Proposed Interim Staff Guidance DC/COL-ISG-024
ESBWR Design-Centered Working Group

U.S. Nuclear Regulatory Commission; NRC-2012-0247
Proposed Interim Staff Guidance, Implementation of Regulatory Guide 1.221 on Design-Basis Hurricane and Hurricane Missiles, 77 Fed. Reg. 64564 (October 22, 2012)

Comment Number	Proposed DC/COL-ISG-024 Page Number	Comment	Suggested Resolution
1	General and Page 1	The title of DC/COL-ISG-024 refers specifically to RG 1.221. However, the guidance is also informed by RG 1.76 and RG 1.142 in order to effectively limit the need to report a design basis hurricane wind speed as a site characteristic.	At a minimum, explain in the purpose that the interim staff guidance explains how to apply RG 1.221, considering NRC regulatory guidance in RG 1.76 and RG 1.142. These two regulatory guides are discussed in detail in the "Issue Discussion" section. The "Staff Guidance" section is dependent upon guidance in all three regulatory guides to support the design basis hurricane wind speed equal to or exceeding 140 mi/hr (63 m/s). Add to the "Purpose" section on Page 1: As explained in detail below, application of RG 1.221 is in conjunction with and informed by guidance in applying RG 1.76, "Design-Basis Tornado and Tornado Missiles for Nuclear Power Plants," and RG 1.142, "Safety-Related Concrete Structures for Nuclear Power Plants (other than Reactor Vessels and Containments)."
2	"Staff Guidance" Section, Page 5	The guidance includes a statement of applicability (i.e., "those sites along the Gulf and Atlantic coasts"). However, "Staff Guidance, c. Combined License Applications," on page 6, and	Because the scope is intended to apply only to certain sites in hurricane areas along the Gulf and Atlantic coasts, modify "Staff Guidance," a. "Early Site Permit Applications," and c."

Comment Number	Proposed DC/COL-ISG-024 Page Number	Comment	Suggested Resolution
		"Applicability," on page 8, do not appear to limit the scope to only the sites along the Gulf and Atlantic coasts. RG 1.221 states: "This guidance applies to the contiguous United States but does not address the determination of the design-basis hurricane wind speed and hurricane-generated missiles for sites located along the Pacific coast or in Alaska, Hawaii, or Puerto Rico; the NRC will evaluate such determinations on a case-by-case basis." It is not clear if the NRC intends all sites within the contiguous US to address the guidance in "Staff Guidance, c. Combined License Applications," or if sites that may be outside the hurricane contour lines need only state that the design-basis tornado is bounding for a site.	Combined License Applications," on page 6 to explain that there is a group of sites in locations outside the hurricane contour lines for which design-bases hurricane winds are not applicable. The following changes are suggested: a. An ESP applicant should use RG 1.221 to determine a site-specific design basis hurricane wind speed for its site. If the proposed site is interior to the contour lines in RG 1.221 (Figures 1, 2, or 3) for 140 mi/hr (63 m/s), no further action is necessary. If the site-specific design basis hurricane wind speed equals or exceeds 140 mi/h (63 m/s), the ESP applicant should add a site characteristic value called "Design Basis Hurricane Wind Speed" to its lists of site characteristics in its site safety analysis report (SSAR).[2] [Footnote.] b. [No change.] a. For each case below, a COL applicant should first use RG 1.221 (Figures 1, 2, and 3) to determine a site-specific design basis hurricane wind speed for its site. If the proposed site is interior to the contour lines for 140 mi/hr (63 m/s), then no further action is necessary. If the site-specific, equals or exceeds 140 mi/h (63 m/s), the COL applicant should determine the design basis hurricane wind speed and

Comment Number	Proposed DC/COL-ISG-024 Page Number	Comment	Suggested Resolution
			hurricane missile spectra (including missile mass and velocity) for its site and add these values to its lists of site characteristics in its COL Final Safety Analysis Report (FSAR). [No change to the cases in Item c that follow this introductory paragraph.]