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Gallagher, Carol

(1)

From: Routh, Stephen [sdrouth@bechtel.com]
Sent: Monday, November 26, 2012 12:12 PM
To: Gallagher, Carol
Cc: Miller, Ed
Subject: Comments on Draft JLD–ISG–2012–06, "Guidance for Performing a Tsunami, Surge, or Seiche Hazard Assessment"

Ms. Gallagher –

Below are comments on draft Interim Staff Guidance JLD–ISG–2012–06, "Guidance for Performing a Tsunami, Surge, or Seiche Hazard Assessment."

Stephen Routh
Manager of Fukushima Response Projects
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Enclosure 1

1. Page 3, Section 1.2 – US Weather Bureau Report No. 33 (Graham and Nunn, 1959) cited in the text is not included in Section 7 (References).

2. Page 5, Section 2.2 – The adoption of the Design Basis Flood (DBF) and Design Basis Storm Surge (DBSS) in the context of the flooding re-evaluation per the March 12, 2012 50.54(f) letter for existing plants could potentially lead to confusion when comparing against the design basis of the current licenses in the flooding hazard re-evaluation report. Please reconsider clarifying or changing these terms.

3. Page 6, Section 3 – "Section 0 (ANS/ANS-2.8-1990)" referenced in the second paragraph is not a section in the draft guide.

4. Page 8, Section 3.2.1 – confirm if the Hurricane Parameters section should apply to the West Coast.

5. Page 11, Section 3.3.1 – Regarding the statement "With the exception of the Great Lakes that use regional datums, elevations should be documented as NAVD88", considerations should be given to the fact that a majority of the existing plants located outside of the Great Lake region used NGVD29 or MSL, not NAVD88, as the referenced datum in the UFSARs, design/as-built drawings, and in some of data sources used to support the flooding analyses. Recognizing that the selection of a preferred datum in a flooding evaluation is subject to a number of different factors, it is important for the guide to specify that all mixed use of datums must be reconciled, and that can be done by converting all source data to the datum selected or during comparisons of the flooding results with the grade elevations of the safety features and the current licensing basis. This comment applies to Section 3.4.1, page 6, of Enclosure 2 on Tsunami Hazard Assessment.

6. Page 15, Section 5.4 – The antecedent (initial) water level of 10% high tide + initial rise + sea level rise specified for the flooding reevaluation is not appropriate for low water level evaluation. Same comment applies to Section 4.3, page 9 of Enclosure 2 on Tsunami Hazard Assessment. In addition, some hurricane parameters, for example, the storm track, will likely be different between low water and the flooding analyses, although it is recognized that some of the storm surge model setup and input data for the flood simulation can be retained for the low water simulation.

Enclosure 2

7. Page 6, Section 3.4.1 – See Comment 5 above on choice of preferred datum.

8. Page 9, Section 4.3 – (a) SLOSH and ADCIRC models mentioned here appear to have been carried over from Enclosure 1 unintentionally; (b) See Comment 6 above.

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