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Comment On: NRC-2014-0071-0003

Tornado Missile Protection; Extension of Comment Period

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79FR 18933

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7

Submitter Information

Name: Bruce Thompson

Submitter's Representative: Beth Dalick

Organization: V.C Summer Unit 1

General Comment

The draft RIS does not take into consideration the level of detail in current licensing bases (CLB) for pre-General Design Criteria plants. In many cases historical information in the CLB met the documentation expectations at the time the bases were established, but would require additional detail and rigor to meet today's expectations. Yet throughout the plant's operating history it was subject to reviews, audits and inspections based on the contents of its CLB. When evaluating the plant for conformance to the CLB for tornado protection, the NRC should use the NRC regulations and guidance provided in Regulatory Guides and Standard review plans in effect at the time the applicable portion of the CLB was established. In cases where the historical regulations and standards do not meet the current safety standards, Probabilistic Risk Analysis could be used to assess the impact of the current plant as-built configuration in terms of delta core damage frequency. If the results are acceptable in accordance with RG 1.174, no further action should be required of the plant.

SUNSI Review Complete

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Att- J. Keene (JTK1)