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Natural Phenomena Hazards in Fuel Cycle Facilities

**Comment On:** NRC-2015-0035-0001  
Natural Phenomena Hazards in Fuel Cycle Facilities; Draft Interim Staff Guidance for Comment

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## General Comment

I have four comments on the Interim Staff Guidance.

In the section titled Consideration of NPH in ISA of Existing Fuel Cycle Facilities, on page 2 of 8 in the PDF file, the end of the first paragraph states, The current building code uses ground motions with a  $4 \times 10^{-3}$  annual exceedance probability. This exceedance probability would be a ground motion with a 250-year return period. This may be a typo, and perhaps it should be  $4 \times 10^{-4}$ , for a 2500-year return period. Please confirm whether or not this is a typo.

In the section titled Graded Approach to Consideration of NPH in the ISA, on page 4 of 8, the second bullet in the list states, Preventing loss of capability to perform functions important to safety during and/or after the earthquake that could lead to consequences to the public and/or worker. I suggest replacing earthquake with event so this encompasses all NPH events, not just earthquakes.

In the section titled Evaluation of Structures and Components at Existing Facilities, on page 4 of 8, the final paragraph on the page contains the sentence, Facilities designed and constructed with building codes and standards that contained criteria for seismic loads resulting from earthquakes having accelerations associated to 10 percent probability of exceedance in 50 years. This is an incomplete sentence, and its intent is unclear.

In the section titled Emergency Response and Other Considerations, on page 7 of 8, is the statement, Consistent

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Add = J. Marcand (JML5)*

with the regulations and guidance in NUREG-1520, licensees should establish a process to periodically re-evaluate changes to the natural phenomena data and data collection methods, modeling techniques (hazard curves), and assessment methods to ensure assumptions are still valid. If this statement is correct, please clarify exactly where this requirement or expectation for a periodic re-evaluation of changes to NPH data, models, and methods appears. At present, 10 CFR Part 50 contains no such requirement for power reactor licensees (see Fukushima Near-Term Task Force recommendation 2.2), and I am unaware of such a requirement for 10 CFR Part 70 licensees. Please elaborate on the location of this requirement or, if none exists, modify this paragraph.