UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 18, 2016

Vice President, Operations
Entergy Nuclear Operations, Inc.
James A FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

SUBJECT: JAMES A FITZPATRICK NUCLEAR POWER PLANT- STAFF ASSESSMENT OF INFORMATION PROVIDED PURSUANT TO TITLE 10 OF THE *CODE OF FEDERAL REGULATIONS* PART 50, SECTION 50.54(f), SEISMIC HAZARD REEVALUATIONS FOR RECOMMENDATION 2.1 OF THE NEAR-TERM TASK FORCE REVIEW OF INSIGHTS FROM THE FUKUSHIMA DAI-ICHI ACCIDENT (CAC NO. MF3725)

Dear Sir or Madam:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued a request for information pursuant to Title 10 of the *Code of Federal Regulations*, Part 50, Section 50.54(f) (hereafter referred to as the 50.54(f) letter). The purpose of that request was to gather information concerning, in part, seismic hazards at each operating reactor site and to enable the NRC staff, using present-day NRC requirements and guidance, to determine whether licenses should be modified, suspended, or revoked.

By letter dated March 31, 2014, Entergy Nuclear Operations, Inc. (Entergy, the licensee), responded to this request for James A. FitzPatrick Nuclear Power Plant (JAF).

The NRC staff has reviewed the information provided related to the reevaluated seismic hazard for JAF and, as documented in the enclosed staff assessment, determined that you provided sufficient information in response to Enclosure 1, Items (1) – (3), (5) - (8) and the comparison portion of Item (4) of the 50.54(f) letter. Further, the NRC staff concludes that the licensee's reevaluated seismic hazard is suitable for other actions associated with Near-Term Task Force Recommendation 2.1, "Seismic".

As indicated in the NRC letter dated October 27, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15194A015), Entergy is requested to submit a spent fuel pool evaluation and either a full-scope Individual Plant Examination of External Events (IPEEE) relay chatter review or a High Frequency (HF) confirmation. In choosing one of the two options, Entergy should consider that a relay chatter study will continue to be needed for the IPEEE submittal to meet the Screening, Prioritization, and Implementation Details (SPID) acceptance criteria. Meeting the SPID criteria will be necessary if Entergy plans to rely on the IPEEE results in its mitigation strategies assessment with respect to the reevaluated hazard.

Contingent upon the NRC staff's review and acceptance of Entergy's HF confirmation (Item 4) or the full-scope IPEEE relay chatter review and spent fuel pool evaluation (Item (9)) for JAF, the Seismic Hazard Evaluation identified in Enclosure 1 of the 50.54(f) letter will be completed.

If you have any questions, please contact me at (301) 415-1617 or at Frankie.Vega@nrc.gov.

Sincerely,

Frankie G. Vega, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket No. 50-333

Enclosure:
Staff Assessment of Seismic
Hazard Evaluation and Screening Report

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STAFF ASSESSMENT BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO SEISMIC HAZARD AND SCREENING REPORT

JAMES A. FITZPATRICK NUCLEAR POWER PLANT

DOCKET NO. 50-333

1.0 INTRODUCTION

By letter dated March 12, 2012 (NRC, 2012a), the U.S. Nuclear Regulatory Commission (NRC or Commission) issued a request for information to all power reactor licensees and holders of construction permits in active or deferred status, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(f) "Conditions of license" (hereafter referred to as the "50.54(f) letter"). The request and other regulatory actions were issued in connection with implementing lessons-learned from the 2011 accident at the Fukushima Dai-ichi nuclear power plant as documented in the "Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident" (NRC, 2011b).[1] In particular, the NRC Near-Term Task Force (NTTF) Recommendation 2.1, and subsequent Staff Requirements Memoranda (SRM) associated with Commission Papers SECY-11-0124 (NRC, 2011c) and SECY-11-0137 (NRC, 2011d), instructed the NRC staff to issue requests for information to licensees pursuant to 10 CFR 50.54(f).

Enclosure 1 to the 50.54(f) letter requests that addressees perform a reevaluation of the seismic hazards at their sites using present-day NRC requirements and guidance to develop a ground motion response spectrum (GMRS).

The required response section of Enclosure 1 requests that each addressee provide the following information:

(1) Site-specific hazard curves (common fractiles and mean) over a range of spectral frequencies and annual exceedance frequencies,

(2) Site-specific, performance-based GMRS developed from the new site-specific seismic hazard curves at the control point elevation,

(3) Safe Shutdown Earthquake (SSE) ground motion values including specification of the control point elevation,

(4) Comparison of the GMRS and SSE. A high frequency (HF) evaluation (if necessary),

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[1] Issued as an enclosure to Commission Paper SECY-11-0093 (NRC, 2011a).

(5) Additional information such as insights from NTTF Recommendation 2.3 walkdown and estimates of plant seismic capacity developed from previous risk assessments to inform NRC screening and prioritization,

(6) Interim evaluation and actions taken or planned to address the higher seismic hazard relative to the design basis, as appropriate, prior to completion of the risk evaluation (if necessary),

(7) Selected risk evaluation approach (if necessary),

(8) Seismic risk evaluation (if necessary), and

(9) Spent fuel pool (SFP) evaluation (if necessary).

Present-day NRC requirements and guidance with respect to characterizing seismic hazards use a probabilistic approach in order to develop a risk-informed performance-based GMRS for the site. Regulatory Guide (RG) 1.208, A Performance-based Approach to Define the Site- Specific Earthquake Ground Motion (NRC, 2007), describes this approach. As described in the 50.54(f) letter, if the reevaluated seismic hazard, as characterized by the GMRS, is not bounded by the current plant design-basis SSE, further seismic risk evaluation of the plant is merited.

By letter dated November 27, 2012 (Keithline, 2012), Nuclear Energy Institute (NEI) submitted Electric Power Research Institute (EPRI) report "Seismic Evaluation Guidance: Screening, Prioritization, and Implementation Details (SPID) for the Resolution of Fukushima Near-Term Task Force Recommendation 2.1 Seismic"(EPRI, 2012), hereafter called the SPID. The SPID supplements the 50.54(f) letter with guidance necessary to perform seismic reevaluations and report the results to NRC in a manner that will address the Requested Information Items in Enclosure 1 of the 50.54(f) letter. By letter dated February 15, 2013 (NRC, 2013b), the staff endorsed the SPID.

The required response section of Enclosure 1 to the 50.54(f) letter specifies that Central and Eastern United States (CEUS) licensees provide their Seismic Hazard and Screening Report (SHSR) by 1.5 years after issuance of the 50.54(f) letter. However, in order to complete its update of the EPRI seismic ground motion models (GMM) for the CEUS (EPRI, 2013), industry proposed a six-month extension to March 31, 2014, for submitting the SHSR. Industry also proposed that licensees perform an expedited assessment, referred to as the Augmented Approach, for addressing the requested interim evaluation (Item 6 above), which would use a simplified assessment to demonstrate that certain key pieces of plant equipment for core cooling and containment functions, given a loss of all alternating current power, would be able to withstand a seismic hazard up to two times the design-basis. Attachment 2 to the April 9, 2013, letter (Pietrangelo, 2013) provides a revised schedule for plants needing to perform (1) the Augmented Approach by implementing the Expedited Seismic Evaluation Process and (2) a seismic risk evaluation. By letter dated May 7, 2013 (NRC, 2013a), the NRC determined that the modified schedule was acceptable and by letter dated August 28, 2013 (NRC, 2013c), the NRC determined that the updated GMM (EPRI, 2013) is an acceptable GMM for use by CEUS plants in developing a plant-specific GMRS.

By letter dated April 9, 2013 (Pietrangelo, 2013), industry committed to following the SPID to develop the SHSR for existing nuclear power plants. By letter dated September 12, 2013 (Coyle, 2013), Entergy Nuclear Operations, Inc. (Entergy, the licensee) submitted partial site response information for the James A. FitzPatrick Nuclear Power Plant (FitzPatrick, JAF) site. By letter dated March 31, 2014 (Coyle, 2014), Entergy submitted its SHSR.

2.0 REGULATORY BACKGROUND

The structures, systems, and components (SSCs) important to safety in operating nuclear power plants are designed either in accordance with, or meet the intent of Appendix A to 10 CFR Part 50, General Design Criteria (GDC) 2: "Design Bases for Protection Against Natural Phenomena;" and Appendix A to 10 CFR Part 100, "Reactor Site Criteria." The GDC 2 states that SSCs important to safety at nuclear power plants shall be designed to withstand the effects of natural phenomena such as earthquakes, tornadoes, hurricanes, floods, tsunami, and seiches without loss of capability to perform their safety functions.

For initial licensing, each licensee was required to develop and maintain design bases that, as defined by 10 CFR 50.2, identify the specific functions that an SSC of a facility must perform, and the specific values or ranges of values chosen for controlling parameters as reference bounds for the design. The design bases for the SSCs reflect appropriate consideration of the most severe natural phenomena that had been historically reported for the site and surrounding area. The design bases also considered limited accuracy, quantity, and period of time in which the historical data have been accumulated.

The seismic design bases for currently operating nuclear power plants were either developed in accordance with, or meet the intent of GDC 2 and 10 CFR Part 100, Appendix A. Although the regulatory requirements in Appendix A to 10 CFR Part 100 are fundamentally deterministic, the NRC process for determining the seismic design-basis ground motions for new reactor applications after January 10, 1997, as described in 10 CFR 100.23, requires that uncertainties be addressed through an appropriate analysis such as a probabilistic seismic hazard analysis (PSHA).

Section 50.54(f) of 10 CFR states that a licensee shall at any time before expiration of its license, upon request of the Commission, submit written statements, signed under oath or affirmation, to enable the Commission to determine whether or not the license should be modified, suspended, or revoked. On March 12, 2012, the NRC staff issued requests for licensees to reevaluate the seismic hazards at their sites using present-day NRC requirements and guidance, and identify actions planned to address plant-specific vulnerabilities associated with the updated seismic hazards.

Attachment 1 to Enclosure 1 of the 50.54(f) letter describes an acceptable approach for performing the seismic hazard reevaluation for plants located in the CEUS. Licensees are expected to use the CEUS Seismic Source Characterization (CEUS-SSC) model in NUREG- 2115 (NRC, 2012b) along with the appropriate EPRI (2004, 2006) GMMs. The SPID provides further guidance regarding the appropriate use of GMMs for the CEUS. Specifically, Section 2.3 of the SPID recommends the use of the updated GMM (EPRI 2013) and, as such, licensees used the NRC-endorsed updated EPRI GMM instead of the older EPRI (2004, 2006)

GMM to develop PSHA base rock hazard curves. Finally, Attachment 1 requests that licensees conduct an evaluation of the local site response in order to develop site-specific hazard curves and GMRS for comparison with the plant SSE.

2.1 Screening Evaluation Results

By letter dated March 31, 2014 (Coyle, 2014), Entergy provided its SHSR for the JAF site. The licensee's SHSR indicates that the site GMRS exceeds the site SSE for a portion of the frequency range between 1 to 10 Hertz (Hz). However, the licensee indicated that over the frequency range of 1 to 10 Hz, the GMRS is bounded by either the site SSE or the site Individual Plant Examination of External Events (IPEEE) plant-level high confidence of low probability of failure (HCLPF) spectrum (IHS). The licensee provided an evaluation of its IPEEE program, as described in Section 3.3 of the SPID, in order to use the IHS as the plant capacity spectrum for the screening comparison with the GMRS. Above 10 Hz, the IHS also exceeds the GMRS. However, the full scope IPEEE detailed review of relay chatter required in SPID Section 3.3.1 has not yet been completed by the licensee. Therefore, the licensee stated that it will complete the relay chatter review consistent with NEI letter to NRC dated October 3, 2013 (Keithline, 2013), on the same schedule as the HF confirmation as proposed in the NEI letter dated April 9, 2013 (Pietrangelo, 2013), and accepted in NRC's letter dated May 7, 2013 (NRC, 2013a).

On May 9, 2014 (NRC, 2014a), the NRC staff issued a letter providing the outcome of its 30- day, preliminary, screening and prioritization evaluation. In the letter, the NRC staff characterized the JAF site as conditionally screened-in, because additional information was needed to support a screening decision based on the licensee's use of the IHS for the screening comparison. The licensee responded in a letter dated August 21, 2014 (Entergy, 2014), to the staff's requested additional information (NRC, 2013d and NRC, 2014c). The NRC staff discussed the requested additional information with the licensee during a public meeting with the licensee on June 19, 2014 (NRC, 2014b). On December 31, 2014 (NRC, 2014c), the NRC staff issued a letter providing the outcome of its final seismic screening and prioritization results.

Based on its evaluation of the SHSR, the licensee's original IPEEE submittal, and the request for additional information response, the NRC staff confirmed that the licensee met the IPEEE adequacy criteria specified in the SPID provided that the relay chatter review is completed. As such, the NRC staff confirmed that the licensee's GMRS, as well as the staff's confirmatory GMRS is bounded by the SSE or IHS for JAF over the frequency range of 1 to 10 Hz, and therefore, a plant seismic risk evaluation is not warranted for JAF. Additionally, in the frequency range above 10 Hz, the GMRS exceeds the SSE and is bounded by the IHS. As such, to satisfy the IPEEE adequacy criteria an IPEEE relay chatter review is merited. This initial screening decision was contigent on the licensee's successful completion of the IPEEE relay chatter review, in accordance with the IPEEE program screening criteria in the SPID. As stated in the October 27, 2015 (NRC, 2015), letter, the NRC revised this initial screening determination. Based on the NRC staff's comparison of the GMRS to the SSE and the review of additional hazard and risk information, the NRC concluded that a seismic risk evaluation was not merited for Fitzpatrick regardless of satisfying the IPEEE acceptance criteria in the SPID. Because the IPEEE program did not include an evaluation of the SFP and the GMRS exceeds

the SSE above 6 Hz, the SFP evaluation is merited. Additionally, in accordance with the October 27, 2015, letter, either a HF confirmation or a IPEEE relay chatter review are merited.

3.0 TECHNICAL EVALUATION

The NRC staff evaluated the licensee's submittal to determine if the provided information responded appropriately to Enclosure 1 of the 50.54(f) letter with respect to characterizing the reevaluated seismic hazard.

3.1 Plant Seismic Design-Basis

Enclosure 1 of the 50.54(f) letter requests the licensee provide the SSE ground motion values, as well as the specification of the control point elevation(s) for comparison to the GMRS. For operating reactors licensed before 1997, the SSE is the plant licensing basis earthquake and is characterized by (1) a peak ground acceleration (PGA) value which anchors the response spectra at high frequencies (typically at 20 to 30 Hz for the existing fleet of nuclear power plants); (2) a response spectrum shape which depicts the amplified response at all frequencies below the PGA; and (3) a control point where the SSE is defined.

In Section 3.1 of its SHSR, the licensee described its seismic design bases for the JAF site and stated that the SSE was developed through an evaluation of the maximum earthquake potential for the region surrounding the site. Based on this evaluation, the licensee anchored a Housner response spectral shape at a PGA of 0.15 g (15 percent of the acceleration due to earth's gravity). In Section 3.2 of its SHSR, the licensee specifies that the SSE control point is defined at a depth of 12 ft [3.7 m] at the top of the Oswego sandstone in which all plant structures are foundedEntergy, 2013).

The NRC staff reviewed the licensee's description of its SSE for JAF site in the SHSR. With regard to the SSE for JAF site, based on its review of the SHSR and the Updated Final Safety Analysis Report (UFSAR) (Entergy, 2013), the NRC staff confirmed that the licensee's SSE is anchored at a PGA of 0.15 g with a Housner design response spectral shape. In addition, based on its review of the SHSR and the UFSAR (Entergy, 2013), the NRC staff confirmed that the licensee's control point elevation for JAF site SSE is consistent with the guidance provided in the SPID.

3.2 Probabilistic Seismic Hazard Analysis

In Section 2.2 of its SHSR, the licensee stated that, in accordance with the 50.54(f) letter and the SPID, it performed a PSHA using the CEUS-SSC model and the updated EPRI GMM for the CEUS (EPRI, 2013). The licensee used a minimum magnitude (**M**) of 5.0, as specified in the 50.54(f) letter. The licensee further stated that it included the CEUS-SSC background sources out to a distance of 400 miles [640 km] around the site and included the Charlevoix and Wabash Valley repeated large magnitude earthquake (RLME) sources, which lie within 621 mi [1,000 km] of the site. The RLME sources are those source areas or faults for which more than one large magnitude (**M** ≥ 6.5) earthquake has occurred in the historical or paleo-earthquake (geologic evidence for prehistoric seismicity) record. The licensee used the mid-continent version of the updated EPRI GMM (EPRI, 2013) for each of the CEUS-SSC sources.

Consistent with the SPID, the licensee did not provide its base rock seismic hazard curves in SHSR Section 2.2.2 since a site response analysis is necessary to determine the control point seismic hazard curves. The licensee provides its control point seismic hazard curves in Section 2.3.7 of its SHSR. The NRC staff's review of the licensee's control point seismic hazard curves is provided in Section 3.3 of this staff assessment.

As part of its confirmatory analysis of the licensee's GMRS, the NRC staff performed its own PSHA calculations for base rock conditions at the JAF site. As input, the NRC staff used the CEUS-SSC model as documented in NUREG-2115 (NRC, 2012b) along with the updated EPRI GMM model (EPRI, 2013). Consistent with the guidance provided in the SPID, the NRC staff included all CEUS-SSC background seismic sources within a 310 mi [500 km] radius of the JAF site. In addition, the NRC staff included RLME sources which lie within 621 mi [1,000 km] of the site. For each of the CEUS-SSC sources used in the PSHA, the NRC staff used the mid- continent version of the updated EPRI GMM (EPRI, 2013). The NRC staff used the resulting base rock seismic hazard curves together with a confirmatory site response analysis, described in the next section, to develop control point seismic hazard curves and a GMRS for comparison with the licensee's results.

Based on its review of the SHSR, the NRC staff concludes that the licensee followed the guidance provided in the SPID for selecting PSHA input models and parameters for the site. This includes the licensee's use and implementation of the CEUS-SSC model and the updated EPRI GMM model.

3.3 Site Response Evaluation

After completing PSHA calculations for reference rock site conditions, Attachment 1 to Enclosure 1 of the 50.54(f) letter requests that the licensee provide a GMRS developed from the site-specific seismic hazard curves at the control point elevation. In addition, the 50.54(f) letter specifies that the subsurface site response model, for both soil and rock sites, should extend to sufficient depth to reach the generic or reference rock conditions as defined in the GMMs used in the PSHA. To develop site-specific hazard curves at the control point elevation, Attachment 1 requests the licensee perform a site response analysis.

Detailed site response analyses were not typically performed for many of the older operating plants; therefore, Appendix B of the SPID provides detailed guidance on the development of site-specific amplification factors (including the treatment of uncertainty) for sites that do not have detailed, measured soil and rock parameters to extensive depths.

The purpose of the site response analysis is to determine the site amplification that will occur as a result of bedrock ground motions propagating upwards through the soil/rock column to the surface. The critical parameters that determine what frequencies of ground motion are affected by the upward propagation of bedrock motions are the layering of soil and/or soft rock, the thicknesses of these layers, the shear-wave velocities and low-strain damping of the layers, and the degree to which the shear modulus and damping change with increasing input bedrock amplitude.

3.3.1 Site Base Case Profiles

The licensee provides detailed site profile descriptions in Sections 2.3.1 and 2.3.2 of its SHSR, primarily based on information cited in the UFSAR (Entergy, 2013). According to the licensee, the JAF site is located in the Erie-Ontario Lowland Physiographic Province of New York. The licensee indicated that: 1) approximately 12 ft (3.7 m) of till overly the Ordovician Oswego sandstone at the site, 2) the bedrock is estimated to be at a depth of about 1,700 ft (518 m), and 3) that the plant structures at the site are founded directly on the Oswego Sandstone and have an embedment of 49.5 ft (15 m) below the surrounding yard grade.

In Table 2.3.1-1 of its SHSR, the licensee provided a brief description of the subsurface materials in terms of the geologic units and layer thicknesses. In Table 2.3.2-1 of its SHSR, the licensee provided the shear-wave velocities determined from seismic refraction surveys, a borehole geophysical survey, and microtremor measurements that it performed during the original site investigation before 1970 (Entergy, 2013). The licensee stated that these geophysical surveys indicated that: 1) the shear-wave velocity for the Oswego Sandstone is 7,000 to 8,000 ft/sec (2,133 to 2,438 m/sec) with a range from 5,559 to 8,020 ft/sec (1694 to 2445 m/sec) in the upper 130 ft (40 m), and 2) estimates of shear-wave velocity are greater than or equal to 9,300 ft/sec (2,830 m/sec) for the deeper layers. The licensee stated that the control point, or the top elevation of its site response, is at a depth of 12 ft (3.7 m) below the surface at the interface of basal till overlying the Ordovician Oswego sandstone.

To characterize subsurface geology, the licensee developed three site base case profiles at the JAF site. The middle, or best estimate, profile was developed by taking the mean of the shear-wave velocity measurements for the Oswego Sandstone (Vs = 7,500 ft/sec or 2,286 m/sec) to a depth of 1,700 ft (518 m) from the control point to hard reference rock. The licensee developed the upper and lower base case profiles using a natural log standard deviation of 0.35. Table 2.3.2-1 and Figure 2.3.2-1 of the SHSR provide the licensee's shear-wave velocity profile for each of the three base cases. Figure 3.3-1 of this assessment shows the licensee's three shear-wave velocity base case profiles.

As described in Section 2.3.2.1 of its SHSR, in the absence of any site-specific dynamic material property measurements, the licensee followed the SPID guidance for rock sites and selected two alternative characterizations of site-specific dynamic material behavior. In the first characterization, the licensee modeled non-linear behavior using the generic EPRI rock shear modulus and damping curves over the upper 500 ft (152 m) of the profile. In the second characterization, the licensee modeled linear behavior with a low strain damping value (about 3 percent) from the EPRI rock damping curves for the same upper 500 ft (152 m) of the profile. The licensee assigned equal weights to the two characterizations.

The licensee also considered the impact of kappa, or small strain damping, on site response. Kappa is measured in units of seconds (sec), and is the damping contributed by both intrinsic hysteretic damping as well as scattering due to wave propagation in heterogeneous material. For the JAF site, the licensee used the low strain damping values, shear-wave velocities, layer thicknesses, and bedrock damping to arrive at kappa values for the best estimate, upper, and lower base case velocity profiles of 0.014, 0.019, and 0.006 sec, respectively.

To account for randomness in material properties across the JAF site, the licensee stated in Section 2.3.3 of its SHSR that it developed random shear-wave velocity profiles from the base case profiles. The licensee stated that 30 random velocity profiles were generated using a natural log standard deviation of 0.25. In addition, as stated in Section 2.3.2 of its SHSR, the licensee randomized the depth to bedrock by ±510 ft (±156 m), which corresponds to 30 percent of the total profile thickness. The licensee stated that this randomization did not represent the actual uncertainty in the depth to bedrock, but was used to broaden the spectral peaks.

3.3.2 Site Response Method and Results

In Section 2.3.4 of its SHSR, the licensee stated that it followed the guidance in Appendix B of the SPID to develop input ground motions for the site response analysis and in Section 2.3.5, the licensee described its implementation of the random vibration theory (RVT) approach to perform its site response calculations. Finally, Section 2.3.6 of the SHSR shows the resulting amplification functions and associated uncertainties for two of the eleven input loading levels for the base case profile and EPRI rock shear modulus and damping curves.

In order to develop probabilistic site-specific control point hazard curves, as requested in Requested Information Item 1 of the 50.54(f) letter, the licensee used Method 3, described in Appendix B-6.0 of the SPID. The licensee's use of Method 3 involved computing the site- specific control point elevation hazard curves for a broad range of spectral accelerations by combining the site-specific bedrock hazard curves, determined from the initial PSHA (Section 3.2 of this assessment), and the amplification functions and their associated uncertainties, determined from the site response analysis.

3.3.3 Staff Confirmatory Analysis

To confirm the licensee's site response analysis, the NRC staff performed site response calculations for the JAF site. The NRC staff independently developed a shear-wave velocity profile, damping values, and modeled the potential nonlinear behavior of the rock using measurements and geologic information provided in the JAF UFSAR (Entergy, 2013), the proposed Nine Mile Point Nuclear site (NMP3) safety analysis resport (SAR) (UniStar, 2009), and Appendix B of the SPID. For its site response calculations, the NRC staff employed the RVT approach and developed input ground motions in accordance with Appendix B of the SPID.

Because abundant geophysical measurements were made at the proposed NMP3 site, which is located less than one mile (1.6 km) for the JAF site, and the sub-surface stratigraphy between the two sites appears to be relatively uniform, the NRC staff used the shear wave velocities measured beneath NMP3 for its site response confirmatory analysis. In addition, because these shear wave velocities for the propose NMP3 site were measured using modern methods and analyses, the NRC staff used only a single shear wave velocity profile rather than the three profiles developed by the licensee for its site response analysis. To capture the uncertainty in the depth to reference or base rock, the NRC staff randomized the total profile thickness of 1,700 ft (518 m) value by ±150 ft [±46 m]. Figure 3.3.-1 of this assessment shows the NRC staff velocity profile compared to the base case profiles developed by the licensee. As shown in Figure 3.3-1, the licensee's three base case profiles encompass a much larger range of shear

wave velocities than the range of velocities reported in the proposed NMP3 SAR (UniStar, 2009).

Similar to the approach used by the licensee, the NRC staff assumed both linear and non-linear behavior for the rock beneath JAF site in response to the range of input loading motions. In contrast to the licensee's use of the generic EPRI rock shear modulus and damping curves to model the non-linear behavior of the rock over the upper 500 ft [152 m] of the site profile, the NRC staff used the site specific damping and shear modulus degradation curves determined by UniStar during its investigations for the proposed NMP3. The implementation of these site specific curves provides for very limited non-linear behavior of the rock material even at higher loading levels. For example, the site specific hysteretic damping curves developed for NMP3 are capped at a damping ratio of 1 percent while the EPRI rock damping curves begin at 3 percent and reach 10 to 15 percent for a shear strain value of 0.1 percent. To model the linear behavior of the rock, the NRC staff used a low strain damping value of 0.5 percent. The NRC staff used these two alternative models (non-linear and linear) over the upper 200 ft [61 m] of the site profile, giving each equal weight. Below a depth of 200 ft [61 m], the NRC staff assumed linear behavior for the rock with no damping.

To determine kappa for its single profile, the NRC staff used the low strain damping values, shear wave velocities, and layer thicknesses for each layer to arrive at a total kappa value of 0.014 sec, which includes the 0.006 sec contribution from the base rock. To model the uncertainty in the kappa value, the NRC staff used a natural log standard deviation value of 0.35 to calculate lower and upper values for kappa of 0.006 sec and 0.018 sec.

Figure 3.3-2 of this assessment shows a comparison of the NRC staff's and licensee's median site amplification functions and uncertainties (±1 standard deviation) for 2 of the 11 input loading levels. Above approximately 10 Hz, amplification functions calculated by the licensee are lower than those developed by the NRC staff due to the greater nonlinearity in the licensee's profiles, as well as the higher damping values used by the licensee.

Overall the licensee's approach to modeling the subsurface rock properties and their uncertainty results in lower site amplification factors relative to the staff's results, particularly at high frequencies. As shown in Figure 3.3-3 of this assessment, these differences in the site response analysis have a minor impact on the 1 and 10 Hz control point seismic hazard curves; however, the NRC staff's confirmatory PGA or 100 Hz hazard curve is somewhat higher than the licensee's PGA hazard curve. Appendix B of the SPID provides guidance for performing site response analyses, including capturing the uncertainty for sites with less subsurface data; however, the guidance is neither entirely prescriptive nor comprehensive. As such, various approaches in performing site response analyses, including the modeling of uncertainty, are acceptable for this application.

In summary, the NRC staff concludes that the licensee's site response was conducted using present-day guidance and methodology, including the NRC-endorsed SPID. The NRC staff performed independent calculations which confirmed that the licensee's amplification factors and control point hazard curves adequately characterize the site response, including the uncertainty associated with the subsurface material properties, for the JAF site.

3.4 Ground Motion Response Spectra

In Section 2.4 of its SHSR, the licensee stated that it used the control point hazard curves, described in SHSR Section 2.3.7, to develop the 10^{-4} and 10^{-5} (mean annual frequency of exceedance) uniform hazard response spectra (UHRS) and then computed the GMRS using the criteria in RG 1.208.

The NRC staff independently calculated the 10^{-4} and 10^{-5} UHRS using the results of its confirmatory PSHA and site response analyses, as described in Sections 3.2 and 3.3 of this staff assessment, respectively. Figure 3.4-1 of this assessment shows a comparison of the GMRS determined by the licensee to that determined by the NRC staff.

As shown in Figure 3.4-1, the licensee's GMRS shape is very similar to that calculated by the NRC staff at frequencies less than 10 Hz. However, the NRC staff's confirmatory GMRS is somewhat higher than the licensees at frequencies above 10 Hz. As described above in Section 3.3, the NRC staff concludes that these minor differences over the higher frequency range are primarily due to the differences in the site response analyses performed by the licensee and the NRC staff.

The NRC staff confirms that the licensee used the present-day guidance and methodology outlined in RG 1.208 and the SPID to calculate the horizontal GMRS, as requested in the 50.54(f) letter. The NRC staff performed both a PSHA and site response confirmatory analysis and achieved results consistent with the licensee's horizontal GMRS. As such, the NRC staff concludes that the GMRS determined by the licensee adequately characterizes the reevaluated hazard for the JAF site. Therefore, this GMRS is suitable for use in subsequent evaluations and confirmations, as needed, for the response to the 50.54(f) letter.

4.0 CONCLUSION

The NRC staff reviewed the information provided by the licensee for the reevaluated seismic hazard for the JAF site. Based on its review, the NRC staff concludes that the licensee conducted the hazard reevaluation using present-day methodologies and regulatory guidance, it appropriately characterized the site given the information available, and met the intent of the guidance for determining the reevaluated seismic hazard. The NRC staff concluded that the licensee demonstrated that the IHS could be used for comparison with the GMRS for the screening decision. Based upon the preceding analysis, the NRC staff concludes that the licensee provided an acceptable response to Requested Information Items (1) – (3), (5) – (7), and a partial response to Item (4) identified in Enclosure 1 of the 50.54(f) letter. Further, the licensee's reevaluated seismic hazard is acceptable to address other actions associated with NTTF Recommendation 2.1: "Seismic".

In reaching this determination, the NRC staff confirms the licensee's conclusion that the licensee's GMRS at the JAF site is bounded by either the site SSE or the IHS over the frequency range of 1 to 100 Hz. As stated in the October 27, 2015, letter, a seismic risk evaluation (item 8) is not merited. Because the IPEEE program did not include an evaluation of the SFP and the GMRS exceeds the SSE, the SFP evaluation (Item 9) is merited. Additionally, in the frequency range above 10 Hz, either a HF confirmation (Item 4) or relay chatter review is

merited. The HF confirmation portion of Item (4) is not merited if the IPEEE relay chatter review is successfully completed because the IHS bounds the GMRS in the frequency range above 10 Hz.

The NRC review and acceptance of Entergy's IPEEE relay chatter evaluation or HF confirmation (Item 4) and SFP evaluation (Item 9) for the JAF site will complete the Seismic Hazard Evaluation identified in Enclosure 1 of the 50.54(f) letter.

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Figure 3.3-1 Plot of Staff's and Licensee's Base Case Shear-Wave Velocity Profiles for the JAF site

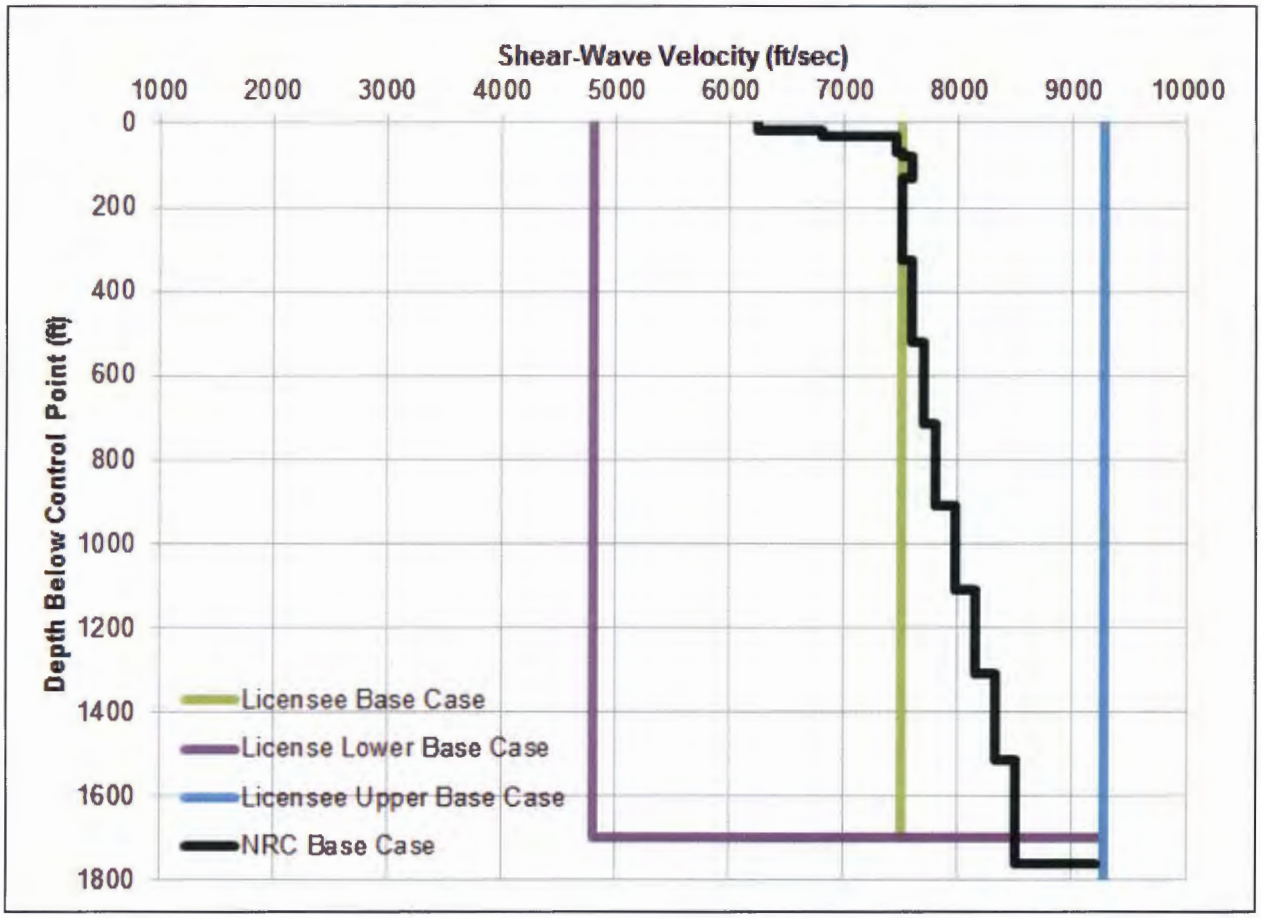


Figure 3.3-2 Plot Comparing the Staff's and the License's Median Amplification Functions and Uncertainties for two input loading levels for the JAF site

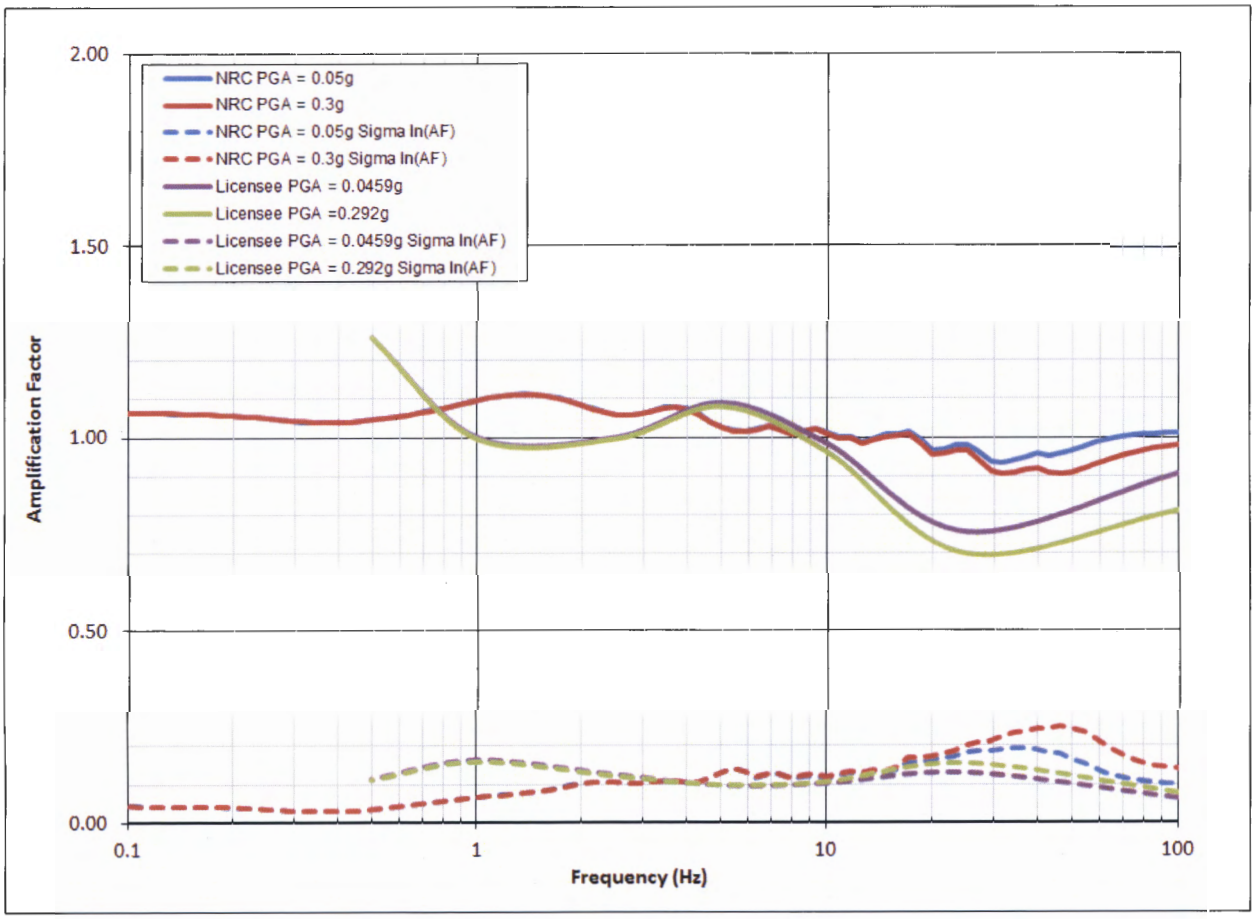


Figure 3.3-3 Plot Comparing the Staff's and the Licensee's Mean Control Point Hazard Curves at a Variety of Frequencies for the JAF site

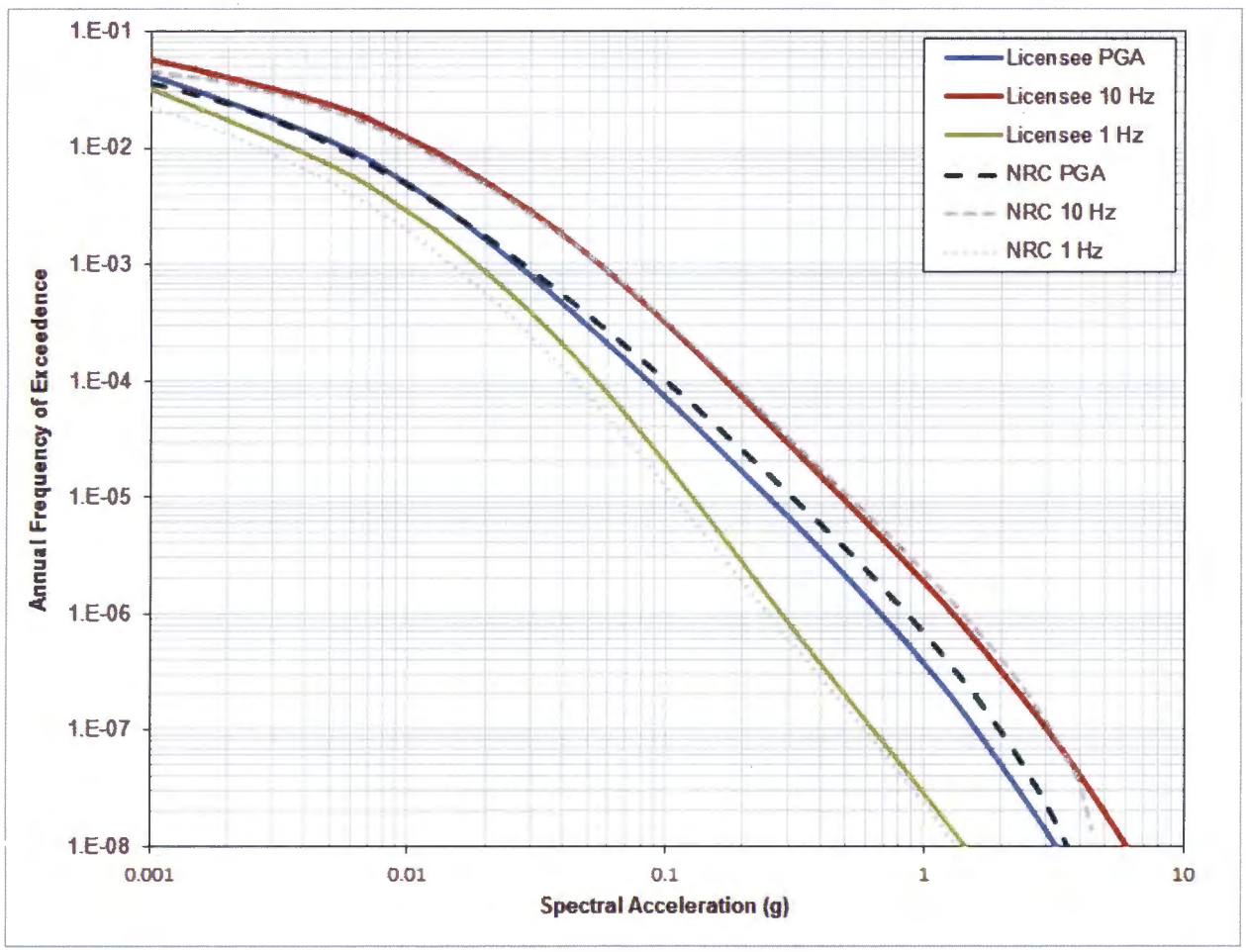
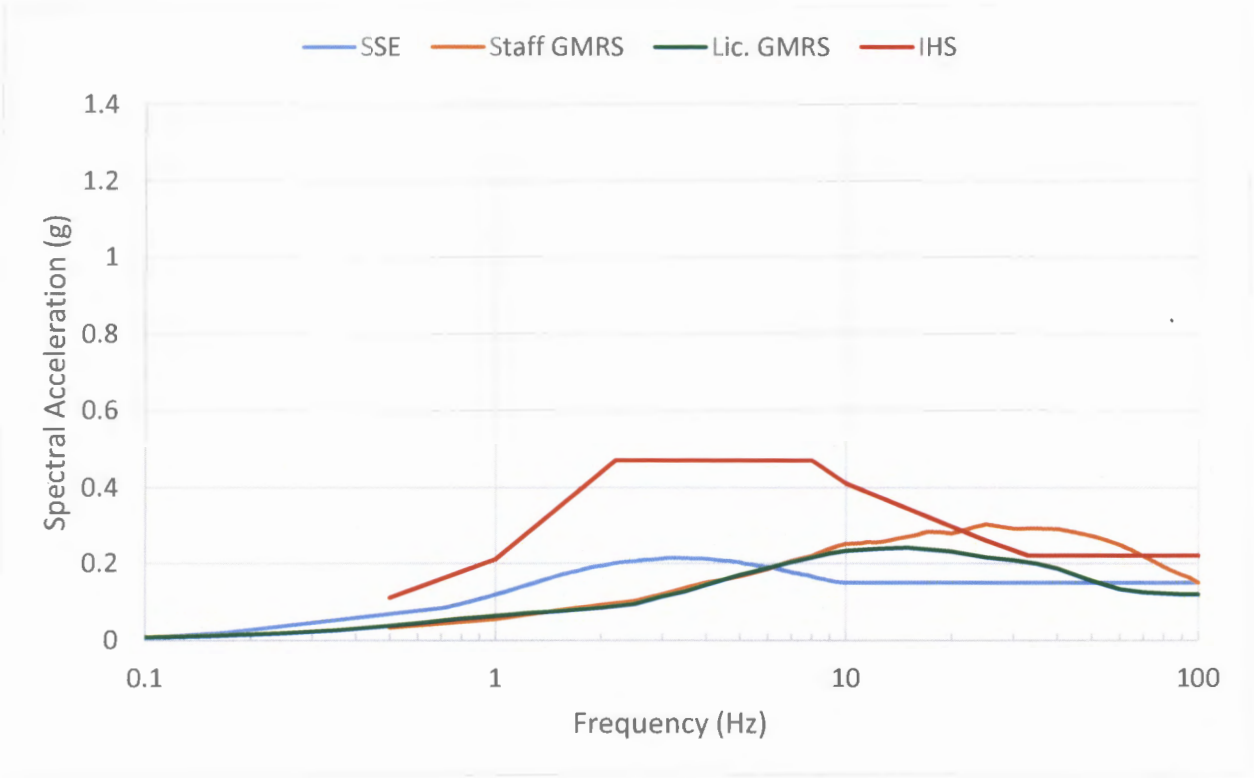


Figure 3.4-1 Comparison of the Staff's GMRS with Licensee's GMRS and the SSE for the JAF site



Contingent upon the NRC staff's review and acceptance of Entergy's HF confirmation (Item 4) or the full-scope IPEEE relay chatter review and spent fuel pool evaluation (Item (9)) for JAF, the Seismic Hazard Evaluation identified in Enclosure 1 of the 50.54(f) letter will be completed.

If you have any questions, please contact me at (301) 415-1617 or at Frankie.Vega@nrc.gov.

Sincerely,

/RA/

Frankie G. Vega, Project Manager
Hazards Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket No. 50-333

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Hazard Evaluation and Screening Report

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