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December 19, 2016

Dr. Sunil D. Weerakkody
Chief, Probabilistic Risk Assessment Operations and Human Factors Branch
Division of Risk Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on New Seismic Section of the NRC's Risk Assessment of Operational Events ("RASP") Handbook

Project Number: 689

Dear Dr. Weerakkody:

The Nuclear Energy Institute¹ appreciates your invitation to provide comments on a recent addition to the NRC's Risk Assessment of Operational Events Handbook (commonly known as the "RASP" Handbook). The addition provides guidance for modeling of seismic events.²

We believe the document should strongly encourage the use of the licensee's peer-reviewed seismic probabilistic risk assessment (SPRA), when one is available for the plant in question. The licensee's SPRA models provide an efficient way to produce a more accurate estimate of risk significance than is feasible using the approach presented in the RASP guidance. Both efficiency and accuracy are extremely important in this period in which NRC and industry must work together to economize on resources and avoid less efficient work-arounds that distract resources from their most valuable use—a constant focus on safety.

We also recommend that the NRC release to the public the source documents cited in the seismic section that are currently withheld from the public. Disclosure of this non-public information is important to the transparency of the regulatory process.

Our detailed comments are provided in the attachment to this letter.

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

² RASP Handbook section titled, "Seismic Event Modeling and Seismic Risk Quantification", released September 20, 2016, ADAMS Accession Number ML16264A140.

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If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "James E. Slider". The signature is written in black ink and is positioned below the word "Sincerely,".

James E. Slider

Attachment