

**From:** Saxton, John  
**To:** [Gaither, Mike](#)  
**Subject:** LC 10.19 Issue  
**Date:** Thursday, June 29, 2017 11:13:00 AM

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Mike,

Staff is currently reviewing Lost Creek's request to remove License Condition 10.19 (Meteorological Data) and has identified several apparent flaws in Lost Creek's application of its statistical analyses. The major deficiency was use of data that were collected at less than the required 90 percent data recovery rate; however, there were other concerns including no discussions of the validity of certain statistical assumptions (e.g., normality), autocorrelation of data or use of paired t-test rather than a simple t-test.

Staff is willing to document the deficiencies in a request for additional information; however, staff also notes that Lost Creek has collected at least 3 consecutive years, and a total of 5 years of data that meet the required data recovery criterion. With this period of record (POR) for the on-site data collection, Lost Creek may elect to pursue demonstrating long-term representativeness through methods found acceptable in other NRC program areas rather than revising the statistical analyses. Guidance documents/standards applicable to the other program areas include NUREG-1567, NUREG-800, Regulatory Guide 1.23 and ANSI/ANSI-2.15-2013.

If Lost Creek elects to pursue the on-site POR alternative to demonstrate long-term representativeness, please provide a qualitative discussion of its valid meteorological data record to note any major discrepancies that may dismiss the collection period as unrepresentative of the long-term meteorological conditions in the site vicinity. If no major discrepancies are noted, LCI should state as much.

Also, please provide a brief description of the method to disassemble the met station.

John