

Enclosure 2: Comments on Draft Update of RASP Handbook for Seismic from NRC Internal Stakeholders

Source	#	Section	Comment	Resolution of the Comment
RES	1		We may still be vulnerable to adverse industry comments regarding the “pedigree” of the fragility information – it would be good to include some additional background and a unified NRC view on the purpose and use of this information in the guidance.	Revised wordings in Section 4.2.4 clarify the use of the available fragility numbers as surrogates
RES	2		Although we are embarking on a project to add seismic to all SPAR models, this will take some time. So, in the interim, the SRA/risk analyst will have either: (a) a recent SPAR-AHZ model developed based on information (recognizing that this may also vary, e.g., Vogtle versus DC Cook), (b) a SPAR-EE model (as with the on-going Monticello issue), and (c) only a SPAR internal events model. For each of these cases, a different course of action may be needed (and even when INL is finished, some consideration as to the different manner in which the models were developed may be needed). It would be useful in the guidance more directly addressed the path for each of these situations.	It is understand that there are different level of external–hazard (such as seismic) modeling in SPAR-AHZ, SPAR-EE, and Internal-events-only models. However, the purpose of the handbook is to provide guidance and practical information to PRA analyst for seismic-related issues that may arise, regardless of the level of exiting modeling. Analysts can, and should, adjust the existing SPAR models based on the plant conditions for their work. Therefore, it is not appropriate to have guidance tailored to each path (or level of existing modeling).
RES	3		Might be good to provide background/pointers to references for NTTF insights and results as these would likely be brought up by the industry during an SDP.	Relevant NTTF references such as high-frequency relay chatters, seismically-induced fire and flooding, have been included in Section 4.2. Plant-specific seismic hazard curves are organized and included in Appendix 4A. Other plant-specific insights, while could be beneficial during an SDP, are not readily available and typically not included in RASP Handbook guidance.

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RES	4		The seismic hazard curves contain detailed uncertainty information, which could be used if needed and may become more meaningful given the push on Aggregation by industry and our own efforts with NUREG-1855. Some mention of their existence and how it could be useful would have been an easy addition to this document.	Revised Appendix 4A to mention the available uncertainty information for the seismic hazard curves.
RES	5		Suggest to document all the tables, curves, and fragility numbers in a separate Excel spreadsheet exclusively.	RASP Handbook is a publicly-available document and it also serves the purpose of letting external stakeholders know about the practical guidance that is used by the staff. It should be noted that some of the fragility numbers are proprietary and non-public; Therefore, if all data, curves, tables, and fragility numbers are stored outside RASP Handbook in a non-publicly-available file exclusively, external stakeholders will not be able to see what input is used by the staff.