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**From:** Vokoun, Patricia  
**Sent:** Thursday, July 26, 2018 1:54 PM  
**To:** Vokoun, Patricia  
**Subject:** FW: Re: Public Meeting

**From:** William Lettis [mailto:lettis@lettisci.com]  
**Sent:** Wednesday, July 18, 2018 5:03 PM  
**To:** Vokoun, Patricia <Patricia.Vokoun@nrc.gov>  
**Subject:** [External\_Sender] Re: Public Meeting

Hi Patricia

I am very much a strong proponent of the SSHAC process for performing and documenting a seismic hazard analysis (or any other natural hazard phenomena), and I appreciate the new implementation guidelines "Updated Implementation Guidelines for SSHAC Hazard Studies". However, as a member of the public (and with past experience in performing SSHAC Level 3 studies), I would like to offer the following two comments on the subject draft SSHAC guidance document

(1) As an NRC-sponsored document, the SSHAC implementation guidelines should focus on the technical guidelines for performing a SSHAC study and not on commercial contracting requirements. As currently written, the document specifies that the project sponsor (e.g., a utility) must first retain an individual (the Project Technical Integrator), who then consults with the project sponsor (or their Project Manager) to select the Technical Integrator Leads, who then select the TI Teams, hazard specialist, etc. This specific guidance of hiring only "individuals" to perform the study excludes a project sponsor (say a utility) from retaining a consulting company (for example, a Bechtel, Enercon, Rizzo consultants, etc) from performing the study – even though these companies are perfectly capable of performing the study (and have performed many SSHAC Level 1, 2 and 3 studies previously that have been accepted by the NRC). I strongly object to the NRC providing formal guidelines that deliberately dictate commercial contracting requirements (e.g., please see pages 2-15 and 2-16)? It would be useful to at least allow that a Project Sponsor (e.g., a utility) may retain the services of a qualified consulting firm that will, in turn, retain the services of project personnel with requisite experience and qualifications.

(2) The SSHAC implementation guidelines, as currently written, provide extremely confusing guidance on what the final deliverable of the SSHAC process may be, and how this deliverable relates to formal Quality Assurance for submittal of a license application to the NRC. As currently written, the guideline requires that the SSHAC process concludes with formal calculation of a PSHA and developing a "PSHA Report" (please see Figures 3-2 and 3-3). Traditionally, the SSHAC process was developed only to provide assurance that the center, body and range of uncertainty is properly identified and incorporated into the seismic source and ground motion models *for input to a PSHA (emphasis added)* and NOT the formal QA PPSHA calculation itself. Input to the final PSHA calculation is provided in a Hazard Input Document (HID). Many previous SSHAC Level 3 studies have concluded with development of the HID and NOT a PSHA Report; the formal PSHA was performed *following* completion of the SSHAC study (e.g., the recently completed Diablo Canyon, Palo Verde and SWUS SSHAC Level 3 studies all concluded with an HID, NOT a final PSHA – and all of which were approved by NRC staff). The benefit to this approach provides the Project Sponsor with the option of performing the SSHAC study without formal QA (i.e., the SSHAC process itself provides the necessary QA as shown on Figure 3-9, and which I agree with), concludes the SSHAC study with development of an HID with PPRP concurrence letter, and allows for formal calculation of the PSHA following completion of the SSHAC under a separate QA program. This flexibility (i.e., to perform the final PSHA calculation within SSHAC or to defer the formal QA PSHA to following SSHAC) should be provided in the implementation guidelines – because in practice this is what many utilities want to do.

Please let me know if you have any questions regarding my comments, or if I can provide further clarification.

Sincerely  
William Lettis

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**From:** William Lettis [<mailto:lettis@lettisci.com>]  
**Sent:** Monday, July 16, 2018 12:57 PM  
**To:** Vokoun, Patricia <[Patricia.Vokoun@nrc.gov](mailto:Patricia.Vokoun@nrc.gov)>  
**Subject:** [External\_Sender] Public Meeting

Hi Patricia

My name is William Lettis and I would like to attend the public meeting on SSHAC Wed July 18 via teleconference call.

Please send me the call in information

Thanks  
Bill Lettis