

We suggest discussion of the following topic areas to provide clarity:

- What is the intent of the discussion of the SSHAC process relative to non-seismic events
- Safety significance is cited as a factor when determining the SSHAC level needed. Can safety significance be taken into account relative to the power reactor design and siting location characteristics (Can a robust plant design at a site location with low seismicity and dose consequence to the public use a SSHAC level 2 instead of 3?)
- The qualitative attributes of determining the need to update a SSHAC study
- Previous SSHAC level 1 and 2 studies are not subject to updated SSHAC regulations
- The qualitative nature of selection criteria for SSHAC team
- Evaluation and discussion of impacts to the operating fleet, ESPA and COLA holders/applicants

Specific comments/questions

No.	Section and Page No.	Comment	Resolution Path
1	Sec. 1.3, pages 1-5, 1-8 and Figure 1-2 Sec. A.6, pages A-8 through A-10	Repeated reference to applicability of SSHAC methods to other external events while admission that detailed implementation guidelines can't be developed yet due to lack of subject matter maturity. Subtext implication for NRC staff is that SSHAC should be used for other events such as flooding, volcanism, high winds with some guidance.	Delete or radically revise Section A.6 as well as text and Figure in Section 1.3. Make it completely clear that this NUREG is NOT recommending any SSHAC for non-seismic external events.
2	Sec. 3.2.1 pages 3-12 thru 3-14	The 5 factors delineated on page 3-13 for selecting the apropos SSHAC level are qualitative and subject to interpretation (as stated on page 3-12); A sixth factor should be added regarding whether significant public risk (individual dose >10 CFR 100.11) results from 1E-4 to 1E-5/year seismic events.	Provide more quantification or clarification of the 5 factors and add a sixth factor. Language for this 6 <sup>th</sup> factor is on page 3-14 in penultimate paragraph of Section 3.2.1`
3	Sec. 4.2 pages 4-2 thru 4-5	The 6 decision factors for updating existing SSHAC studies are generally qualitative (e.g. "changes") and subjective. No guidance is given on how to handle conflicting factors except for one example.	Clarify factors with more guidance and, as appropriate, quantification. Expand conflicting factor guidance.
4	Executive summary page xiv, last paragraph; Sec. 2 last paragraph before 2.1	Statements imply or can be interpreted by NRC staff to mean that existing Level 1 and 2 SSHAC need to be re-performed.	Revise language to clarify that completed SSHAC 1/2 are not necessarily required to be re-performed because of the guidance in NUREG-2311
5	Sec. 3.4 page 3-26	SSHAC team selection criteria is very subjective, uses many adjectives, but no	Include nuclear power industry and more NRC

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		quantitative criteria such as number of years of directly relevant experience; the fact that the authors and list of participants interviewed constitute much if not all of the available SSHAC expertise introduces considerable bias and self-interest in criteria.	participants in specifying SSHAC team selection criteria. Expand criteria to be more quantitative (e.g., number of years of experience in performing SSHAC, etc.)