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Volcanic Hazards Assessment for Proposed New and Advanced Nuclear Power Plants

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Volcanic Hazards Assessment for Proposed New and Advanced Nuclear Power Plants

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General Comment

In the discussion of the selection of the SSHAC Level, it is stated on page 9 that there is a distinction between the attributes that would require a Level 3 study versus a Level 4 study. In particular, the criteria for a Level 4 study are more challenging than those for a Level 3 study. This position implies that a Level 4 study would provide a higher level of regulatory assurance than a Level 3 study because it can handle additional challenges. However, this position is in direct contrast to the position in NUREG-2213 and NUREG-2117.

As stated at multiple locations in NUREG-2213, the NRC makes no distinction in terms of regulatory assurance between SSHAC Levels 3 and 4. For example, on page 3-14: "As noted in NUREG-2117, the NRC makes no distinction between SSHAC Level 3 and 4 studies in terms of the regulatory assurance afforded by either level. As a result, in order to achieve the high levels of regulatory assurance needed for nuclear facilities (see Section 2.5) and to avoid some of the additional burdens associated with Level 4 studies (see Section 3.1), "

Because of this lack of a distinction on the part of the NRC, the Level 3 approach has gained significant favor for nuclear facilities in the US and worldwide because it involves fewer people, costs less, and takes less time. To artificially create a distinction in this Reg Guide will lead to confusion not only in the application to future volcanic hazard analyses, but also to decisions made previously by nuclear utilities regarding SSHAC Levels based on their understanding of regulatory guidance documents, including NUREG-2213.

As discussed in detail in NUREG-2213, the distinction in regulatory assurance between Level 2 and Level 3 studies is much larger than the distinction between Levels 3 and 4. I therefore suggest that the third bullet on page 9 be deleted and the fourth bullet be reworded slightly to the following:

Level 3 or 4: facility with potentially large source terms or design fragilities; significant number of alternative or potentially contradictory hazard models available; low confidence in the completeness and accuracy of the geologic record; and numerous complex, multi-hazard scenarios considered

This revised wording and concept is consistent with other regulatory guidance issued by the NRC.