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Docket: NRC-2020-0237
Considerations for Estimating Site-Specific Probable Maximum Precipitation at Nu-clear Power Plants in the United States of America

Comment On: NRC-2020-0237-0001
Considerations for Estimating Site-Specific Probable Maximum Precipitation at Nuclear Power Plants in the United States of America

Document: NRC-2020-0237-DRAFT-0003
Comment on FR Doc # 2020-28708

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General Comment

NEI Comments on “Draft NUREG/KM– 0015, “Considerations for Estimating Site-Specific Probable Maximum Precipitation at Nuclear Power Plants in the United States of America,” 85 FRN 85683-85685; Docket ID NRC-2020-0237

Attachments

03-01-21_Letter to NRC with Industry Comments on Draft NUREG KM-0015 with Attachment

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Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Program Management, Announcements and Editing Staff

Project Number: 689

Subject: NEI Comments on "Draft NUREG/KM– 0015, "Considerations for Estimating Site-Specific Probable Maximum Precipitation at Nuclear Power Plants in the United States of America," 85 FRN 85683-85685; Docket ID NRC-2020-0237.

Submitted via regulations.gov

Dear Program Management, Announcements and Editing Staff,

The Nuclear Energy Institute (NEI)[1], on behalf of our members, appreciates the opportunity to provide comments on the subject Draft NUREG/KM– 0015, "Considerations for Estimating Site-Specific Probable Maximum Precipitation at Nuclear Power Plants in the United States of America." We are supportive of the staff's efforts to maintain and preserve knowledge concerning the lessons-learned from the recent flood hazard re-evaluations at current and planned nuclear power plant sites performed most recently in connection with the staff 2012 §50.54(f) reviews in the creation of this document.

In our review, we noted that this draft NUREG/KM summarizes the knowledge the NRC staff has developed over the course of the reviews based on the similarities and differences between methodologies pertaining to site-specific probable maximum precipitation (SSPMP) calculated at U.S. nuclear power plants. The attachment includes several recommendations to enhance the document and improve clarity for your use in finalizing this regulatory guide.

We appreciate the NRC's effort in developing this draft guidance and encourage your consideration of all stakeholder comments prior to finalizing this draft NUREG. We trust that you will find these comments useful

[1] The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

and informative. Please contact me at fap@nei.org or (202) 739-8132 with any questions or comments about the content of this letter or the attached comments.

Sincerely,

Frances A. Pimentel

Attachment
c: Kevin Quinlan, NRR/DEX/EXHB

Attachment 1
Comments on Draft NUREG/KM– 0015, "Considerations for Estimating Site-Specific Probable Maximum Precipitation at Nuclear Power Plants in the United States of America."

	Section	Comment/Basis	Recommendation
1.	TOC / Overall	The document provides guidance on how to use existing information to estimate Site-Specific Probable Maximum Precipitation at NPPs in the US. In many places, it talks about "professional" judgement, justification and documentation. It would be useful to have a section on Gathering New Information to fill in gaps.	Add a section on Gathering New Information.
2.	TOC / Overall	The document is basically a Knowledge Summary of work that has been performed in the US. It would be useful to have a section if similar work has been performed in Europe.	Add a section on Gathering New Information.
3.	TOC / Overall	It would be useful to have a section on the most common gaps seen in the 50.54(f) submittals. What were the most common NRC Requests for Additional Information?	Add a section on the most common "gaps" seen in the 50.54(f) submittals and the most common NRC Request for Additional Information.
4.	Section 1.1 Background	This sections states, "GDC 2 requires, […]. GDC 2 also requires [….]." Since GDC can only be described as requirements for post-GDC plants and under particular circumstances (see COM-SECY-16-0020) change this wording to be, "GDC 2 states that…."	Change "GDC 2 requires" to "GDC 2 states that" in the two sentences as described in comment/basis.
5.	Section 1.6/2.2	Recommend that the NUREG provide discussion on the benefits/reasons of developing and utilizing site-specific PMP analyses in lieu of generalized event derivations from sources such as Hydrometeorological Reports (HMRs).	Provide discussion as described in comment/basis.

	Section	Comment/Basis	Recommendation
6.	Section 9.1.1	additional wording	Insert new paragraph: "In a submitted LAR, artificial isohyetal storm patterns, as discussed in HMR No. 52, were not used. PMP values from an NRC-approved TP, adjusted to account for topographic influences, was generated for each grid point on a gridded network covering the entire drainage basin for given storm areas and durations. The gridded PMP approach produces a default spatial pattern that closely follows NOAA Atlas 14 precipitation frequency patterns following the approach in HMRs 55A, 57 and 59. Since the total drainage basin consisted of numerous sub-basins and dams, a large number of spatial distributions over sub-basins and combinations of sub-basins were evaluated in the hydraulic modeling to maximize volume over various portions of the watershed to test for dam failures and to maximize stream-flow and flooding levels at plant sites.
7.	Section 9.2	Recommend providing examples of any concerns/challenges that were encountered during review of licensee site-specific PMP estimates. Specifically, any analytical techniques or inputs that resulted in licensees revising and resubmitting site-specific PMP calculations.	Provide examples as described in comment/basis.
8.	Section 9.2	Additional wording	After the words, "historical rainfall events or different isohyetal patterns" recommend adding the words "or gridded sub-basin combinations"
9.	11.1 Paragraph 2	Recommend including a discussion on how site-specific PMP estimates relate to the current licensee guidance documents. The currently approved revision of Regulatory Guide 1.59 significantly pre-dates many of the scientific advancements, research and source documents that have made site-specific estimations a viable meteorological option.	Provide discussion as described in comment/basis.