

Industry Comments on Seismic Recommendations 2.1 and 2.3

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Comments on 2.1 GMRS for CEUS Plants

- Validate existing site characterization
 - Licensees may choose to obtain additional geophysical or geotechnical data
 - Within 180 days of the date of the 50.54(f) letter, licensees may request additional time to obtain that additional data
- Update the EPRI (2004, 2006) model using SSHAC Level 2
- Calculate the GMRS and compare it to the SSE (within 2 years of the date of the 50.54(f) letter)

Comments on 2.1 GMRS for WUS Plants

- Plants in the Western U.S. are requested to use a SSHAC Level 3 process in the development of an updated site-specific PSHA. Based on past experience, those studies are expected to take at least 3 years to complete. Therefore, the WUS plants will need 4 years to complete items 1, 2, and 3.

Comments on 2.1

- PRA-based SMAs or full RG 1.200 peer-reviewed SPRAs would take much longer to complete than the requested 3 years.
 - Methodology needs to be developed and agreed to and validated through a pilot process
 - Resources to implement and review are limited
 - There is no guidance for spent fuel pool SMAs or SPRAs
 - The implementation details developed during the initial 180 days will determine the scope and time needed to complete the risk assessments

Comments on 2.1

- For Step 3 in Attachment 1, what does “detailed justification” mean? This needs to be understood to determine whether the requested schedule is reasonable.

Comments on 2.3 Requested Actions

- Verify current plant configuration with the existing licensing basis (SSE)
- Verify current maintenance plans and identify vulnerabilities
- Report improvements made as part of the licensee's response to the IPEEE program for seismic issues

Comments on 2.3 Proposed Scope for Walkdowns

- Based on IPEEE Safe Shutdown Equipment List (SSEL)
 - Use 10-15% sample initially (expand if necessary per CAP)
 - Ensure sample includes equipment from each “Class of 20”
 - Include spent fuel pool (SFP) cooling equipment
 - Include equipment in flowpath from UHS
 - Include new, replaced, or modified SSEL equipment since IPEEE
- Equipment may be screened out of walkdown scope per EPRI NP-6041-SL, Rev. 1, such as piping
- Review plant areas for seismic-induced flood and fire, housekeeping, and other potential interactions

Comments on 2.3 Walkdown Team Qualifications

- EPRI-developed training for Walkdown Personnel
 - Based on GIP walkdown elements only
 - “Seismic Walkdown Engineers (SWEs)”
- A-46 Seismic Capability Engineers are already trained and could serve as SWEs
- Two SWEs; seismic experience, but PE not required

Comments on 2.3 Procedures

- Procedural effectiveness will be addressed in Corrective Action Program (CAP) if degradation or other issues identified in walkdowns
- Need clarification on objective of procedure-related bullets 6-10

Comments on 2.3 Documentation and Peer Review

- Use modified IPEEE walkdown sheets
- Available on site for NRC inspection
- Peer reviews will be performed; internal plant personnel can perform peer reviews

Comments on 2.3 Final Report

- Information on plant specific licensing basis seems to require reiteration of existing FSAR content?

Comments on 2.3 Schedule

- 120 Days – Develop an industry standard guideline
 - Plants are expected to implement the industry standard guideline
 - Plants will separately develop their own site-specific procedures (will not need to be submitted to NRC)
- 180 Days - Only equipment that is reasonably and safely accessible when plant is online will be included (if the walkdown includes equipment that can be inspected only during an outage, then implementation will take longer than 180 days)