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General Comment

First comment: The fourth paragraph of the discussion section of the document refers to updated seismic hazard information from the U.S. Geological Survey. Presumably, this means either the 2008 or 2014 updates to the USGS National Seismic Hazard Map (NSHM). Given that this Generic Letter is directed at nuclear facilities, was consideration given to instead referring to the updated seismic source characterization provided in 2012 by the Central and Eastern United States Seismic Source Characterization (CEUS-SSC) for Nuclear Facilities, NUREG-2115? The facilities targeted in this Generic Letter presumably have a number of Structures, Systems, and Components (SSCs) that would be categorized as Seismic Design Category (SDC) 2 or 3 per the categorization scheme of ANSI/ANS-2.26-2004 (R2010), Categorization of Nuclear Facility Structures, Systems, and Components for Seismic Design. Although ANS-2.26 Table A.2 recommends using the USGS 2500-year return period ground motion for SDC-2 SSCs, SDC-3 SSCs should use a site-specific uniform hazard response spectrum at the 4E-4 annual frequency of exceedance for the design basis ground motion. Applying the CEUS-SSC model would meet this standard for SDC-3 SSCs.

Second comment: Requested action 1.a asks the addressees to submit their definitions of unlikely, highly unlikely, and credible for natural phenomena hazard events. Why does not the NRC provide uniform definitions of these terms, i.e., annual expected frequencies such as 1E-2 for credible, 1E-3 for unlikely, and 1E-4 for highly unlikely? This should be the role of the regulator. Varying definitions from each licensee does not seem sensible.

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