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May 27, 1982

Mr. Harold Denton  
Director, Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Denton:

The purpose of this letter is to clarify our position in regard to the value for the safe shutdown earthquake to be included in the supplemental safety evaluation report for the Skagit/Hanford Nuclear Project.

For the reasons discussed below, we recommend that the SER state that an SSE value of 0.35g is assigned for the S/HNP site, that this value is an upper bound and conservative, and that the applicant reserves the right to undertake in the future a site specific response spectra for the purpose of establishing a lower value for the SSE.

Through discussions which we have had in recent months with members of the Geosciences Branch, there is general agreement that 0.35g is a conservative value for the SSE for the S/HNP site. This value has been chosen because the plant was being designed to 0.35g at the former location in Skagit County. While we are very confident that a site specific response spectra will result in a lower value for the SSE, it is essential that the review process come to an end expeditiously.

This application has been under review for a total of eight years, and many millions of dollars have been spent by the applicants on the geology and seismology of the Hanford reservation. Even more has been spent by the Washington Public Power Supply System and the Department of Energy. A tremendous amount of data has been collected, fully adequate in our view to reach sound decisions regarding the geology and seismology of the site.

For the purpose of completing the geology review the realistic decision appears to be to choose 0.35g as the value for the SSE, which is conservative and will envelope any seismic event that could be envisioned for this location.

At the same time, we see a real potential for savings by designing those portions of the project not already designed to 0.35g to a lower value SSE that might result from a site specific response spectra. Therefore, we wish to reserve the right to undertake that work in the future, even if it requires an amendment to the PSAR following issuance of the construction permits. We request that you prepare the safety evaluation report as suggested, and that the staff proceed to complete the health and safety review of this project as expeditiously as possible. As we recently informed the ASLB, we do not

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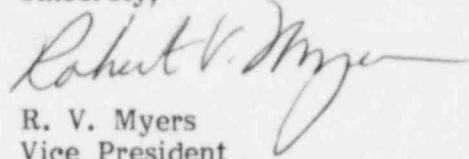
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want to foreclose the opportunity for the health and safety hearings on this project later this year or early next year.

We appreciate the work by the staff which has resulted in the issuance of the draft environmental statement, and urge that the safety review be completed promptly with this approach to the SSE.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert V. Myers", with a long horizontal flourish extending to the right.

R. V. Myers  
Vice President  
Generation Resources

DGP/bw