



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 1, 2013

To Those on the Enclosed List

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH
NEAR-TERM TASK FORCE RECOMMENDATION 2.3, SEISMIC WALKDOWNS

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a letter requesting additional information per Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter called the 50.54(f) letter). The 50.54(f) letter requested that licensees conduct seismic hazard walkdowns to verify the plant configuration with the current licensing basis. The licensees stated by letter that the seismic walkdowns would be performed in accordance with Electric Power Research Institute EPRI-1025286, "Seismic Walkdown Guidance for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic." Following the NRC staff's initial review of the walkdown reports, regulatory site audits were conducted at a sampling of plants. Based on the walkdown report reviews and site audits, the staff identified additional information necessary to allow the staff to complete its assessments.

Enclosed is a request for additional information (RAI) related to seismic walkdowns. The NRC staff requests that you respond no later than 30 days from the date of this letter. If you have any questions related to the enclosed RAI or the requested submission date, please contact your assigned plant Project Manager.

Sincerely,

A handwritten signature in black ink, appearing to read "R. H. Beall".

Robert H. Beall, Chief
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Enclosures:

1. Request for Additional Information
2. Addressee List

cc w/encls: Listserv

REQUEST FOR ADDITIONAL INFORMATION

Seismic Walkdowns

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued a letter requesting additional information per Title 10 of the *Code of Federal Regulations*, Section 50.54(f) (hereafter called the 50.54(f) letter). The 50.54(f) letter requested that licensees conduct seismic hazard walkdowns to verify the plant configuration with the current licensing basis (CLB). The licensees stated by letter that the seismic walkdowns would be performed in accordance with Electric Power Research Institute EPRI-1025286, "Seismic Walkdown Guidance for Resolution of Fukushima Near-Term Task Force Recommendation 2.3: Seismic" (walkdown guidance). Following the NRC staff's initial review of the walkdown reports, regulatory site audits were conducted at a sampling of plants. Based on the walkdown report reviews and site audits, the staff identified additional information necessary to allow the staff to complete its assessments.

1. Conduct of the walkdowns, determination of potentially adverse seismic conditions (PASCs), dispositioning of issues, and reporting

As a result of the audits and walkdown report reviews, the NRC staff noted that licensees' interpretations of the seismic walkdown guidance varied, which resulted in meaningful differences in the process used to disposition identified issues and in the documentation that was provided to the NRC staff. In particular, the application of engineering judgment in determining what constituted a potentially adverse seismic condition (PASC), the threshold for conducting licensing basis evaluations (LBEs), and determining what information was to be reported to the NRC staff varied.

The NRC staff intended that conditions initially marked No (N) or Unknown (U) in the field by the seismic walkdown engineers (SWEs) for which an analysis or calculation was performed would be considered as PASCs and that an analysis or calculation constituted an LBE. The walkdown guidance allows for analysis as part of engineering judgment; however, the intent was to allow for only simple analyses that could be readily performed in support of engineering judgment. Further, the walkdown activities were intended to allow for transparency in the licensee's process to demonstrate that PASCs were appropriately identified, that they were addressed in an appropriate manner, and the basis documented such that the current condition of the plant was clearly consistent with the CLB with regard to seismic capability.

During the audits, the NRC staff identified examples of field observations that were deemed not to be PASCs. However, the basis for the determination was not clearly recorded. In some cases, the field checklists were amplified by noting that the basis was engineering judgment. During site audit discussions, the staff was able to trace the basis for the engineering judgments and found that in many cases they were appropriate. It is expected that these situations would not be included in the walkdown report.

There were other situations that a PASC and LBE were not reported; however, the NRC staff found during the audit that a calculation, analysis (more than just simple), or evaluation was conducted but informally. An example is a confirmatory calculation performed to demonstrate that six anchor bolts out of eight was not a seismically adverse condition. Another example

would be an analysis to demonstrate that an existing, slightly short weld was as seismically sound as the prescribed weld length in the plant design documentation. The staff expected these types of conditions and evaluations to be captured in the licensee's normal plant processes (e.g., condition report or corrective action program (CAP)), and also reported in the walkdown report, since they were potentially adverse seismic conditions that required more than applying judgment or simple analysis to address.

The NRC staff also found that the process that was used to deal with a field observation that was deemed to be a PASC was also not completely described or captured in the report. In many cases, the licensee reported that an LBE was not performed. However, during the audits, it was clear that an LBE (or an equivalent determination method) was performed and used in determining whether a PASC should be entered into the CAP. The staff expects that these conditions would be reported in the walkdown report.

On the whole, through the audits, the NRC staff found that it was able to conclude that the intent of the guidance was met when the licensee's overall process was completely explained, the information was updated to reflect the actual process, and results were updated. The self-assessments conducted by the licensees of the audited plants also identified the lapse in the description of the process used by the licensee to identify a PASC and disposition it.

Therefore, in order to clarify the process that was followed, please provide a description of the overall process used by the licensee (and its contractors) to evaluate observations identified in the field by the SWEs. The process should include how a field observation was determined to be a PASC or not and how the bases for determinations were recorded. Once a determination was made that an observation was a PASC, describe the process for creating a condition report (or other tracking mechanism), performing the LBE (or other determination method), and the resultant action, such as entering it into the CAP, or documenting the result and basis.

Also, in order to confirm that the reported information supports concluding that the plant meets the CLB, please follow one of the following three acceptable alternatives:

- (a) Provide a supplement to the table or text from the original walkdown report, if needed, to include similar conditions as the above examples and situations and for conditions for which a calculation, analysis (if more than a simple analysis), or evaluation was used for a determination. The supplement should include a short description of each condition, how it was dispositioned and the basis for the disposition, as follows: 1) for each condition that was entered into the CAP, provide the CAP reference number, initiation date, and (if known) the planned completion date, or 2) for all other conditions, provide the result of the LBE (or other determination method), the basis for the result, and how (or where) the result was captured in the plant's documentation or existing plant process.
- (b) Following the plant's standard procedures, confirm that a new CAP entry has been made to verify if appropriate actions were taken when reporting and dispositioning identified PASCs (including conditions for which a calculation, analysis (if more than a simple analysis), or evaluation was used for a determination). The eventual CAP closeout, including the process followed and

actions taken, should be in sufficient detail to enable NRC resident inspectors to follow up.

- (c) If no new conditions are identified for addition to the supplement or the CAP entry mentioned above is deemed not necessary, provide a statement of confirmation that all potentially seismic adverse conditions (including conditions for which a calculation, analysis (if more than a simple analysis), or evaluation was used for a determination) identified during the walkdowns and walk-bys were addressed and included in the report to the NRC.

2. Conduct of the Peer Review Process

As a result of the walkdown report reviews, the NRC staff noted that some descriptions of the peer reviewers and the peer review process that was followed were varied and, in some cases, unclear. In some cases, the staff could not confirm details of the process, such as if the entire process was reviewed by the peer review team, who were the peer reviewers, what was the role of each peer reviewer, and how the reviews affected the work, if at all, described in the walkdown guidance.

Therefore, in order to clarify the peer review process that was actually used, please confirm whether the following information on the peer review process was provided in the original submittal, and if not, provide the following.

- (a) Confirmation that the activities described in the walkdown guidance on page 6-1 were assessed as part of the peer review process.
- (b) A complete summary of the peer review process and activities. Details should include confirmation that any individual involved in performing any given walkdown activity was not a peer reviewer for that same activity. If there were cases in which peer reviewers reviewed their own work, please justify how this is in accordance with the objectives of the peer review efforts.

Also, if there are differences from the original submittal, please provide a description of the above information. If there are differences in the review areas or the manner in which the peer reviews were conducted, describe the actual process that was used.

List of Addressees

Arkansas Nuclear One, Units 1 and 2
Docket Nos. 50-313 and 50-368

Vice President, Operations
Arkansas Nuclear One
Entergy Operations, Inc.
1448 S.R. 333
Russellville, AR 72802

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Docket Nos. 50-259, 50-260 and 50-296

Mr. Joseph W. Shea
Vice President, Nuclear Licensing
Tennessee Valley Authority
1101 Market Street, LP 3D-C
Chattanooga, TN 37402-2801

Brunswick Steam Electric Plant, Units 1 and 2
Docket Nos. 50-325 and 50-324

Mr. George T. Hamrick, Vice President
Brunswick Steam Electric Plant
Duke Energy Progress, Inc.
P.O. Box 10429
Southport, NC 28461

Byron Station, Units 1 and 2/Braidwood Station,
Units 1 and 2
Docket Nos. 50-454, 50-455, 50-456, and 50-457

Mr. Michael J. Pacilio, Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office (CNO) - Exelon
Nuclear
4300 Winfield Road
Warrenville, IL 60555

Callaway Plant, Unit 1
Docket No. 50-483

Mr. Adam C. Heflin
Senior Vice President and Chief Nuclear Officer
Union Electric Company
Ameren Missouri
P.O. Box 620
Fulton, MO 65251

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Docket Nos. 50-317 and 50-318

Mr. George H. Gellrich, Vice President
Calvert Cliffs Nuclear Power Plant, LLC.
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, MD 20657-4702

Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 50-414

Mr. Kelvin Henderson, Site Vice President
Duke Energy Carolinas, LLC
Catawba Nuclear Station, Units 1 & 2
4800 Concord Road
York, SC 29745

Clinton Power Station, Unit No. 1
Docket No. 50-461

Mr. Michael J. Pacilio, Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office (CNO) Exelon
Nuclear
4300 Winfield Rd.
Warrenville, IL 60555

Columbia Generating Station
Docket No. 50-397

Mr. Mark E. Reddemann, Chief Executive Officer
Energy Northwest
MD 1023, North Power Plant Loop
P.O. Box 968
Richland, WA 99352

Cooper Nuclear Station
Docket No. 50-298

Mr. Oscar A. Limpas, Vice President-Nuclear and
Chief Nuclear Officer
Nebraska Public Power District
Cooper Nuclear Station
72676 648A Avenue
P.O. Box 98
Brownville, NE 68321

Davis-Besse Nuclear Power Station, Unit 1
Docket No. 50-346

Mr. Ray Lieb, Vice President
FirstEnergy Nuclear Operating Company
c/o Davis-Besse NPS
5501 N. State Route 2
Oak Harbor, OH 43449-9760

Diablo Canyon Power Plant, Unit Nos. 1 and 2
Docket Nos. 50-275 and 50-323

Mr. Edward D. Halpin, Senior Vice President and
Chief Nuclear Officer
Pacific Gas and Electric Company
P.O. Box 56
Mail Code 104/6
Avila Beach, CA 93424

Dresden Nuclear Power Station, Units 2 and 3
Docket Nos. 50-237 and 50-249

Mr. Michael J. Pacilio, Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Duane Arnold Energy Center
Docket No. 50-331

Mr. Rich Anderson, Site Vice President
Next Era Energy
Duane Arnold Energy Center
3277 DAEC Road
Palo, IA 52324-9785

Edwin I. Hatch Nuclear Plant Units 1 and 2
Docket Nos. 50-321 and 50-366

Mr. C. R. Pierce, Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
P.O. Box 1295 / BIN B038
Birmingham, AL 35201-1295

Fermi, Unit 2
Docket No. 50-341

Mr. Joseph H. Plona, Senior VP and Chief Nuclear
Officer
Detroit Edison Company
Fermi 2 - 210 NOC
6400 North Dixie Highway
Newport, MI 48166

Fort Calhoun Station, Unit 1
Docket No. 50-285

Mr. Louis Cortopassi, Vice President and Chief
Nuclear Officer
Omaha Public Power District
Fort Calhoun Station
Mail Stop FC-2-4
9610 Power Lane
Blair, NE 68008

Grand Gulf Nuclear Station, Unit 1
Docket No. 50-416

Vice President, Operations
Entergy Operations, Inc.
Grand Gulf Nuclear Station
P.O. Box 756
Port Gibson, MS 39150

H. B. Robinson Steam Electric Plant, Unit No. 2
Docket No. 50-261

Mr. William R. Gideon, Vice President
H.B. Robinson Steam Electric Plant
Duke Energy Progress, Inc.
3581 West Entrance Road
Hartsville, SC 29550

Hope Creek Generating Station
Docket No. 50-354

Mr. Thomas Joyce, President and Chief Nuclear
Officer
PSEG Nuclear LLC - N09
P. O. Box 236,
Hancocks Bridge, NJ 08038

Indian Point Nuclear Generating Unit Nos. 2 and 3
Docket Nos. 50-247 and 50-286

Vice President, Operations
Entergy Nuclear Operations, Inc.
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249

James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333

Mr. Chris Adner, Licensing Manager
Entergy Nuclear Operations, Inc.
James A. FitzPatrick Nuclear Power Plant
P.O. Box 110
Lycoming, NY 13093

Joseph M. Farley Nuclear Plant, Units 1 and 2
Docket Nos. 50-348 and 50-364

Mr. C. R. Pierce, Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
P.O. Box 1295 / BIN 038
Birmingham, AL 35201-1295

LaSalle County Station, Units 1 and 2
Docket Nos. 50-373 and 50-374

Mr. Michael J. Pacilio, Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office (CNO) Exelon
Nuclear
4300 Winfield Road
Warrenville, IL 60555

Limerick Generating Station, Units 1 and 2
Docket Nos. 50-352 and 50-353

Mr. Michael J. Pacilio, President and Chief Nuclear
Officer
Exelon Nuclear
4300 Winfield Rd.
Warrenville, IL 60555

Millstone Nuclear Power Station, Units 2 and 3
Docket Nos. 50-336 and 50-423

Mr. David A. Heacock, President and Chief Nuclear
Officer
Dominion Nuclear Connecticut, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060

Monticello Nuclear Generating Plant, Unit 1
Docket No. 50-263

Ms. Karen D. Fili, Site Vice President
Northern States Power Company - Minnesota
Monticello Nuclear Generating Plant
2807 West County Road 75
Monticello, MN 55362-9637

Nine Mile Point Nuclear Station, Units 1 and 2
Docket Nos. 50-220 and 50-410

Mr. Christopher Costanzo, Vice President
Nine Mile Point Nuclear Station, LLC
P. O. Box 63
Lycoming, NY 13093

North Anna Power Station, Units 1 and 2
Docket Nos. 50-338 and 50-339

Mr. David A. Heacock, President and Chief Nuclear
Officer
Virginia Electric & Power Company
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, VA 23060

Oconee Nuclear Station, Units 1, 2 and 3
Docket Nos. 50-236, 50-270 and 50-287

Mr. Scott Batson
Vice President, Oconee Nuclear Station
Duke Energy Carolinas, LLC
7800 Rochester Highway
Seneca, SC 29672

Oyster Creek Nuclear Generating Station
Docket No. 50-219

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Palisades Nuclear Plant
Docket No. 50-355

Mr. Anthony J. Vitale, Vice President, Operations
Entergy Nuclear Operations, Inc.
Palisades Nuclear Plant
27780 Blue Star Memorial Highway
Covert, MI 49043-9530

Palo Verde Nuclear Generating Station, Units 1, 2,
and 3
Docket Nos. 50-528, 50-529 and 50-530

Mr. Randall K. Edington
Executive Vice President Nuclear/CNO
Arizona Public Service Company
P.O. Box 52034, MS 7602
Phoenix, AZ 85072-2034

Peach Bottom Atomic Power Station, Units 2 and 3
Docket Nos. 50-277 and 50-278

Mr. Michael J. Pacilio, President and Chief Nuclear
Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Perry Nuclear Power Plant, Unit 1
Docket No. 50-440

Mr. Ernest J. Harkness, President and Chief
Nuclear Officer
FirstEnergy Nuclear Operating Company
Perry Nuclear Power Plant
10 Center Road, A290
Perry, OH 44081

Pilgrim Nuclear Power Station Unit No. 1
Docket No. 50-293

Mr. John Dent, Jr., Vice President – Site VP
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360-5508

Point Beach Nuclear Plant, Units 1 and 2
Docket Nos. 50-266 and 50-301

Mr. Larry Meyer, Site Vice President
NextEra Energy Point Beach, LLC
Point Beach Nuclear Plant, Units 1 & 2
6610 Nuclear Road
Two Rivers, WI 54241-9516

Prairie Island Nuclear Generating Plant,
Units 1 and 2
Docket Nos. 50-282 and 50-306

Mr. James E. Lynch, Site Vice President
Northern States Power Company - Minnesota
Prairie Island Nuclear Generating Plant
1717 Wakonade Drive East
Welch, MN 55089-9642

Quad Cities Nuclear Power Station, Units 1 and 2
Docket Nos. 50-254 and 50-265

Mr. Michael J. Pacilio, Senior Vice President
Exelon Generation Company, LL
President and Chief Nuclear Office (CNO)
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Mr. Joseph E. Pacher, Vice President
R.E. Ginna Nuclear Power Plant
R.E. Ginna Nuclear Power Plant, LLC
1503 Lake Road
Ontario, NY 14519

River Bend Station, Unit 1
Docket No. 50-458

Vice President, Operations
Entergy Operations, Inc.
River Bend Station
5485 U.S. Highway 61N
St. Francisville, LA 70775

Salem Nuclear Generating Station, Units 1 and 2
Docket Nos. 50-272 and 50-311

Mr. Thomas Joyce
President and Chief Nuclear Officer
PSEG Nuclear LLC-N09
P. O. Box 236
Hancocks Bridge, NJ 08038

Shearon Harris Nuclear Power Plant, Unit 1
Docket No. 50-400

Mr. Ernest J. Kapopoulos, Jr., Vice President
Duke Energy Progress, Inc.
Shearon Harris Nuclear Power Plant
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New Hill, NC 27562-0165

South Texas Project, Units 1 and 2
Docket Nos. 50-498 and 50-499

Mr. Dennis L. Koehl, President and CEO/CNO
STP Nuclear Operating Company
South Texas Project Electric Generating Station
P.O. Box 289
Wadsworth, TX 77483

St. Lucie Plant Units 1 and 2
Docket Nos. 50-335 and 50-289

Mr. Mano Nazar, Executive VP and Chief Nuclear
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NextEra Energy
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700 Universe Boulevard
Juno Beach, FL 33408-0420

Surry Power Station, Unit Nos. 1 and 2
Docket Nos. 50-280 and 50-281

Mr. David A. Heacock, President & Chief Nuclear
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Virginia Electric & Power Company
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Glen Allen, VA 23060

Susquehanna Steam Electric Station, Units 1 and 2
Docket Nos. 50-387 and 50-388

Mr. Timothy S. Rausch, Senior Vice President and
Chief Nuclear Officer
PPL Susquehanna, LLC
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Berwick, PA 18603-0467

Three Mile Island Nuclear Station, Unit 1
Docket No. 50-289

Mr. Michael J. Pacilio, President and Chief Nuclear
Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251

Mr. Mano Nazar, Executive VP and Chief Nuclear
Officer
NextEra Energy
P. O. Box 14000
Juno Beach, FL 33408-0420

Vermont Yankee Nuclear Power Station
Docket No. 50-271

Christopher J. Wamser, Site Vice President
Entergy Nuclear Operations, Inc.
Vermont Yankee Nuclear Power Station
320 Governor Hunt Road
Vernon, VT 05354

Virgil C. Summer Nuclear Station, Unit 1
Docket No. 50-395

Mr. Thomas D. Gatlin, Vice President
Nuclear Operations
South Carolina Electric & Gas Company
Virgil C. Summer Nuclear Station
Post Office Box 88, Mail Code 800
Jenkinsville, SC 29065

Wolf Creek Generating Station, Unit 1
Docket No. 50-482

Mr. Matthew W. Sunseri
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
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Burlington, KS 66839

Vogtle Electric Generating Plant, Units 1 and 2
Docket Nos. 50-424 and 50-425

Mr. C. R. Pierce, Regulatory Affairs Director
Southern Nuclear Operating Co., Inc.
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Birmingham, AL 35201-1295

Waterford Steam Electric Station, Unit 3
Docket No. 50-382

Vice President, Operations
Entergy Operations, Inc.
Waterford Steam Electric Station, Unit 3
17265 River Road
Killona, LA 70057-0751

Watts Bar Nuclear Plant, Unit 1
Docket No. 50-390

Mr. Joseph W. Shea, Corporate Manager, Nuclear
Licensing
Tennessee Valley Authority
1101 Market Street, LP 3D-C
Chattanooga, TN 37402-2801

William B. McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370

Mr. Steven D. Capps, Vice President
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Duke Energy Carolinas, LLC
McGuire Nuclear Station
12700 Hagers Ferry Road
Huntersville, NC 28078-8985

November 1, 2013

To Those on the Enclosed List

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH NEAR-TERM TASK FORCE RECOMMENDATION 2.3, SEISMIC WALKDOWNS

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Sincerely,

/ra/

Robert H. Beall, Chief
Plant Licensing Branch I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Enclosures:

1. Request for Additional Information
2. Addressee List

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DISTRIBUTION:

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ADAMS Accession No. ML13304B418

***via e-mail**

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DATE	10/31/13	11/1/13	10/30/13
OFFICE	NRR/JLD/PMB/BC	NRR/DORL/LPL1-1/BC	
NAME	MMitchell (GEMiller for)	RBeall	
DATE	11/1/13	11/1/13	

OFFICIAL RECORD COPY

Letter to Selected Power Reactor Licensees from R. Beall dated November 1, 2013

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ASSOCIATED WITH
NEAR-TERM TASK FORCE RECOMMENDATION 2.3, SEISMIC WALKDOWNS

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RidsNrrPMPaloVerde Resource
RidsNrrPMPeachBottom Resource
RidsNrrPMPerry Resource
RidsNrrPMPilgrim Resource
RidsNrrPMPointBeach Resource
RidsNrrPMPrairieIsland Resource
RidsNrrPMQuadCities Resource
RidsNrrPMRiverBend Resource
RidsNrrPMSalem Resource
RidsNrrPMShearonHarris Resource
RidsNrrPMSouthTexas Resource
RidsNrrPMSummer Resource
RidsNrrPMStLucie Resource
RidsNrrPMSurry Resource
RidsNrrPMSusquehanna Resource
RidsNrrPMThreeMileIsland Resource
RidsNrrPMTurkeyPoint Resource
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