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October 29, 2012

Ms. Cindy Bladey,
Chief, Rules, Announcements, and Directives Branch (RADB)
Office of Administration
Mail Stop: TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments to Docket ID NRC-2012-0222, Guidance for Performing the Integrated Assessment for Flooding

Dear Ms. Bladey:

The Vermont Public Service Department (Department) hereby submits its preliminary comments on the NRC Draft Interim Staff Guidance, JLD-ISG-2012-05, Guidance for Performing the Integrated Assessment for Flooding.

In section 2.3 of JLD-ISG-2012-05 "Guidance for Performing the Integrated Assessment for External Flooding", the Department finds the guidance needs to be more explicit with respect to the reevaluation of the Probable Maximum Flood (PMF). This section has reference to using present-day regulatory methodologies and present-day standard engineering practice. It is not clear whether these current methods/standards are adequate and valid with respect to the PMF. This is critical because the PMF is highly dependent on the methodologies and assumptions that are used to calculate the Probable Maximum Precipitation (PMP).

Also, with regard to calculation of the PMP it is not clear whether the PMP methodology and related assumptions consider climate change. Given that the widely held definition of PMP is "*the greatest depth (amount) of precipitation for a given storm duration that is theoretically possible for a particular geographic location*", will "theoretically possible" consider recent data and research related to climate change? Should PMP durations be extended to consider climate change, and is there a need to employ other extreme event characterization techniques, such as paleo-flood reconstruction and analysis?

If current practice regarding estimation of PMP/PMF are robust and this is articulated in NRC technical guidance then reference to these should be included. If not, then more specifics are needed in this section to stress the importance of the hazard reevaluation component, since the value of the *Integrated Assessment Process* hinges what the "current design basis hazard" is and whether it is adequate.



Thank you for this opportunity to comment,

A handwritten signature in blue ink, appearing to read 'Sarah Hofmann', with a long horizontal flourish extending to the right.

Sarah Hofmann
Deputy Commissioner