



# **Utility View of Part 21s**

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## Discussion Points

- ✓ Utilities drive Part 21 reporting through product purchases
- ✓ Exelon works cooperatively with vendors on reporting issues
- ✓ Once a Part 21 is identified, we are highly engaged in the reporting process, including 10 CFR 50.72/73
- ✓ The rule reads well – not a high degree of complexity

## Discussion Points

- ✓ Exelon implements Part 21 through an Engineering procedure, NUREG-1022, and a customized Exelon Reportability Manual
- ✓ Rulemaking is costly, arduous, and often does not yield the intended results
- ✓ Resolution of NRC concerns with how Part 21 reporting can be improved is better achieved through enhanced guidance as opposed to new regulation

## Discussion Points

- ✓ We encourage a direct discussion on Part 21 issues with the NEI Task Force to develop improved guidance and direction to resolve NRC issues
- ✓ We have an NRC list of issues and we would like to understand each better and work together to develop appropriate solutions