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From: Ann Beranek
To: Michael Lesar
Date: 9/21/01 11:32AM
Subject: Comments on DG-1110, the proposed Revision 1 of Regulatory Guide 1.174

Regulatory Guide 1.174 is not a legitimate regulatory guide in that it has no Regulatory Position and the guidance in the guide is scattered in a disorganized manner.

There is no Implementation section in the guide to tell how the NRC staff will use the guide in regard to submittals.

The title of Regulatory Guide 1.174 states it is "an approach," and an approach does not even infer guidance. I suggest that the title of Revision 1 of Regulatory Guide 1.174 be "Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Regulatory Guide 1.174 is based on the NRC's policy statement on probabilistic risk assessment, not on a regulation; it is therefore not a legitimate regulatory guide or regulatory document.

Regulatory Guide 1.174 does not follow the format or development procedures in RES Office Letter No. 3A, "Regulatory Guide Development Process."

Ann F. Beranek
Technical Writer
Program Management, Policy
Development & Analysis Staff
Office of Nuclear Regulatory Research

CC: Doris Mendiola; John Lane

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A. Beranek (AFB)