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**To:** <nrcprep@nrc.gov>  
**Date:** Wed, Nov 27, 2002 5:56 PM  
**Subject:** Comments on Reactor oversight Process and Pls

Ref: Nov 15 2002 Solicitation of Public Comments on the third year of implementation of the ROP

I have an overall comment as follows:

It is unrealistic to expect that the PI based ROP will minimize the potential for actions adverse to safety by licensees. The Pls are global in nature and there is a long time delay between licensee actions and when it reflects in Pls. A couple of examples, I can sight are the recent Davis Besse Reactor Head problems, and the recent discovery of management inattention to operator training problems (switching between cold shutdown and hot shut down procedures within a span of an hours during crew change. In both cases, the NRC itself is on record stating actions adverse to safety by management as the cause of the problems. There are also other examples of problems in the last three years that indicate ineffectiveness of the global Pls.

So I must conclude the ROP does not do anything to enhance public confidence in safety of the operating reactors.

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