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To: SECY@nrc.gov
CC: Wallace E. Norris
From: Raymond A. West

Subject: Comment for RIN 3150-AH24 (FR Vol. 69, No. 4, January 7, 2004)

Comment:

The 10 CFR 50.55a proposed rule under paragraph (xxviii) reads as follows: "(xxviii) *Reconciliation of Quality Assurance Requirements*. Components used for repair/replacement must be manufactured, procured, and controlled as a safety-related component under a quality assurance program meeting the requirements of Appendix B to 10 CFR part 50 when using IWA-4226.1, 2003 Addenda through the latest edition and addenda incorporated by reference in paragraph (b)(2) of this section." If these words are approved as a written limitation they will effectively eliminate any option a licensee may have to use a commercial grade dedication program to obtain components that are no longer available through an Appendix B supplier.

Recommendation:

Revise the proposed limitation in 10 CFR 50.55a under (xxviii) above to be more consistent with the current limitation under 10CFR50.55a (xvii). Suggested words for the new limitation are as follows: "(xxviii) *Reconciliation of Quality Assurance Requirements*. When purchasing repair/replacement items, in addition to the reconciliation provisions of IWA-4226.1, 2003 Addenda through the latest edition and addenda incorporated by reference in paragraph (b)(2) of this section, the repair/replacement items must be purchased to the extent necessary, in accordance with the licensee's quality assurance program description required by 10 CFR 50.34(b)(6)(ii).

Sincerely,
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