## PR 1,2,10,19,20,21,25,26,50,51,52,54, et. al. (71FR12781)

**DOCKETED 08/28/06** 

Comment No. 22

"BELL, Russ" <rjb@nei.org> From:

To:

<nvg@nrc.gov> Tue, Aug 22, 2006 3:55 PM Date:

Subject: Additional comment/question on Part 52

You have explained to me more than once that the staff did not intend to modify existing Part 50 requirements in the course of mapping/incorporating many of them into Part 52. With this in mind, we have an additional observation about the way the 50.34(h) requirement to evaluate conformance with the SRP has been incorporated into Part 52. 50.34(h) requires that APPLICATIONS contain the SRP conformance evaluation. 52.17(a)(xiii), 52.47(a)(26), 52.79(a)(41) and 52.157(q) all require this evaluation to be part of the SAR.

Was this a purposeful change in application requirements? If so, why does the staff consider it important for the SRP evaluation to be in the SAR? It seems appropriate that this info could reside outside the FSAR, and this would give applicants more flexibility in structuring their applications.

The fix would be to move the requirements to evaluate SRP conformance to 52.17(b), 52.47(b), 52.80 and 52.158.

Please advise. Thanks.

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From: Nanette Gilles Evangeline Ngbea

**Date:** Fri, Aug 25, 2006 5:39 PM

**Subject:** Fwd: Additional comment/question on Part 52

Evangeline - Please add the attached comment from Russ Bell at NEI to the comments on the Part 52 propose rule. I have asked Russ if he intended that this comment be submitted as a formal comment on the rule and he said yes.

Nan

**CC:** Eileen McKenna; Geary Mizuno; Harry Tovmassian; Jerry Wilson; Russ Bell

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**Subject:** Fwd: Additional comment/question on Part 52

Creation Date Fri, Aug 25, 2006 5:39 PM

From: Nanette Gilles

Created By: NVG@nrc.gov

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