

October 22, 2006

Comment on Draft Regulatory Guide DG-1145 Regarding Creation of a New SRP

With the creation of two organizations within the NRC (i.e., NRR and NRO), with NRR covering the current operating reactors and NRO covering the advanced reactors, consideration should be given to the creation of a new Standard Review Plan to correlate directly with the new RG-1145 (once DG-1145 is issued approved).

Have RG-1.70 and it's associated SRP, NUREG-0800 apply to the NRR covered reactors. But create a new SRP for the RG-1145 advanced reactors that will be covered by NRO. The current process of "band-aiding" NUREG-0800 to also apply to the RG-1145 advanced reactors is creating a very confusing process whereby some sections of NUREG-0800 don't apply to the new reactors and vice versa, some of the new information being added to NUREG-0800 does not apply to the current operating reactors. This just increases the regulatory burden and increases the potential for decreased reactor safety.

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