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Interim Staff Guidance on Impacts of Construction of New Nuclear Power Plants on Operating Units at Multi-Unit Sites

**Comment On:** NRC-2011-0031-0001

Office of New Reactors; Interim Staff Guidance on Impacts of Construction of New Nuclear Power Plants on Operating Units at Multi-Unit Sites

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## Submitter Information

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### General Comment

Please clearly explain how 10 CFR 50.59 applies to new plant construction in terms of protecting an operating plant. This regulation pertains only to changes to an operating [licensed] facility? The NRC defines Facility as "any utilization facility as defined [in part 50 of this chapter]. In cases for which a license is issued for operation of two or more facilities, facility means all facilities identified in the license". In the case of new plant construction, there is more than one license on site. The definition of facility addresses each license separately and so does 10 CFR 50.59? It seems therefore, that new plant construction is not a change to the other licensed facility and as such 10 CFR 50.59 does not apply. It seems that 10 CFR 50.59 applies only to the licensed facility experiencing the change?

Changes off-site are referenced on Page 4 in the first paragraph; Why? The new plant construction is not occurring off site. This is confusing. What are you trying to express? The regulatory meaning is not clear. What regulation is required to be complied with for construction of new plants in close proximity [on-site] to operating nuclear plants such that the operating plant is protected? This really needs to be clearly written and clearly defined and a few examples provided. This draft document has not satisfied that very simple goal?

What regulation requires review for an operating Unit when an off-site change may violate the operating Unit's design basis? Is it 10 CFR 50.59?

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