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79 FR 18933

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Submitter Information

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General Comment

This guidance appears to miss the Agency's addressing of tornado missiles as part of GSI-156 for each facility. It is my understanding that a review was performed for most plants and an identification as to whether additional action was needed on the part of the licensee was performed and documented by the NRC staff. The impact of those reviews on the licensing bases is not explicitly addressed. Nor has the NRC staff addressed the apparent reinterpretation by this RIS of that regulatory position and whether that reinterpretation crosses any of the thresholds under 10 CFR 50.109.

This guidance also fails to address supported systems of systems, structures, and components (SSCs) and whether the NRC is reinterpreting the guidance to redefine SSCs to include supported systemns in determining compliance with the applicable general design criteria.

SUNSI Review Complete

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