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Comment On: NRC-2014-0071-0001
Tornado Missile Protection; Draft Guidance

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Submitter Information

Name: Carey Brown
Address:
24526 W Cannock Chase
Shorewood, IL, 60404
Email: careyeb@yahoo.com

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General Comment

The RIS is incomplete in that it does not provide examples of components (or portions of systems) that have to be protected. Specifically, for the EDG's, all portions of the exhaust systems unless specifically exempted by the license, all portions of the combustion air intake, and all portions of the ventilation system. Licensees will, and have, argue that the exhaust pipes and mufflers are not part of the EDGs, etc. Simply restating the original requirements leaves too much room for "interpretation" on the part of the licensees and does nothing to clearly delineate how the licensees have to meet the requirements. As an inspector with a lot of experience with the licensee's methods of reading what they want into the requirements, simple, unequivocal plain english examples would be invaluable so that everyone has the same understanding of the requirements. Please take the extra step to provide examples or at least clear definitions of the terms used in the requirements. As an aside, stating that a licensee has to meet the "current design basis" is meaningless unless the plant is operating under an extended operating license; prior to entering the extended period of operation, current license basis is an undefined term with no legal standing.

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Add-
J. Keene (JK1)