

## Bone, Alysia

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**From:** Laur, Steven  
**Sent:** Monday, July 06, 2015 9:18 AM  
**To:** 'Ernie Kee'  
**Cc:** Bone, Alysia; Regner, Lisa; Watford, Margaret  
**Subject:** RE: Comments on DG 1322

Greetings Mr. Kee:

Whether the comments are submitted as your own, individual comment, or as that of another entity is something that you should determine. The NRC will consider all timely-filed comments; it does not matter if they are submitted by an individual. However, the nature of the commenter may be a consideration in determining the content of the final regulation and regulatory guide.

The directions for submitting comments is found in the Federal Register Notice (FRN) which is available at <http://www.regulations.gov/#!documentDetail;D=NRC-2015-0095-0001>. Under the section Supplementary Information, Section I.B. provides information on how to submit comments. It also contains information on what elements of document submittals are made public.

I hope this answers your questions. If you have more specific non-technical questions relating to the submittal of information, please address questions about NRC dockets to Carol Gallagher; telephone: 301-287-3422; e-mail: [Carol.Gallagher@nrc.gov](mailto:Carol.Gallagher@nrc.gov).

### Steven A. Laur

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**From:** Ernie Kee [mailto:erniekee@gmail.com]  
**Sent:** Thursday, July 02, 2015 10:19 PM  
**To:** Laur, Steven  
**Subject:** [External\_Sender] Comments on DG 1322

Hi Steve,

OI got your email from the NRC DG 1322 comment website under the "further information" section. I'm looking for further information, if you can help.

I'm thinking about submitting some comments as a private citizen, but they are kind of general. In particular, I think that the reg guides on risk-informed regulation (including the draft) could be more helpful if we put less emphasis on CDF and LERF and looked at scenario information more closely on alternatives, more along the lines of risk curves. I also think that defense in depth and safety margin as they appear in risk guidance is causing a lot of confusion (and looking at the risk assessment differently could help clear this up).

I have two basic questions:

1) I'm not sure it's appropriate to make these kind of general comments when they apply to a specific document and there might be another forum for that,

2) I'm not sure, due to my connection to the GSI-191 pilot project, I should submit comments privately. The reason I would prefer to is because I'm pretty sure they are not closely aligned with how the rest of the industry (or maybe NRC) is thinking so I doubt that route would get them submitted.

Please advise as you see fit,

Ernie Kee

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