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General Comment

On page 3.9.6-14 item H, it states, "the application of ASME QME-1-2007 as accepted in Revision 3 to RG 1.100 is one acceptable method for demonstrating the functional design and qualification of RTNSS pumps, valves, and dynamic restraints". This is obviously acceptable to the NRC since it is the same standard that is applied to safety related components in the IST program. The question is, "are there other acceptable methods that the NRC would consider?" Additional wording in the SRP would be helpful to indicate that an alternate method is still possible for non-safety related equipment.

In several locations including examples on page 3.9.6-23, the NRC has changed the word "should" to "needs to be". This is new wording that appears to be less prescriptive than saying "shall", but it is unclear how the NRC will interpret this. There are other examples where "should" was changed to "shall" which indicates clear intent.

On page 3.9.6-25 under (b)(i) it states; "This examination shall also verify the appropriate position of the internal actuating mechanism and proper operation of remote position indicators". This makes the assumption that actuating mechanism is internal which may not be the case. Recommend deleting the word "internal".

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