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General Comment

The proposed regulatory guide revision fails to take into account the engineered safety features that are built into the designs of many of the non-power reactors (NPRs) that make them inherently safe. As such, the "minimum regulation" requirement of the Atomic Energy Act is not being followed and many NPRs are being required to have safety features in instrumentation and control (I&C) systems and provide very little, if any, increase in facility safety. NRC staff repeatedly ignores the Atomic Energy Act requirement and the Commission seems to "turn a blind eye". NUREG-1537 is typically quoted as a requirement and then implemented by NRC staff as if it is regulation. The proposed revision is an extreme imposition on many facilities that will threaten their existence at worst or keep their I&C systems running on archaic technology at best. Instead of assuming that an I&C failure will cause a catastrophic threat to the public and the environment, the NRC staff should evaluate what the actual consequences might be and then adjust their "guidance" accordingly.

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