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General Comment

I concur with the comments posted by the TRTR community. Additionally, hybrid-solution digital upgrades should be addressed, in that if the RPS is analog, and will remain in operation (without modification), the digital control system might potentially fall under a 50.59 modification without requiring a license amendment. This would be an attractive alternative to a complete digital upgrade (control and RPS), and would result in significantly less down-time (and revenue loss) for the facility operator.

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