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Pressurized Water Reactor Control Rod Ejection and Boiling Water Reactor Control Rod Drop Accidents

**Comment On:** NRC-2016-0233-0001

Pressurized Water Reactor Control Rod Ejection and Boiling Water Reactor Control Rod Drop Accidents;  
Request for Comment on Draft Regulatory Guide

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## General Comment

DG-1327 Section 4.4 makes reference to Regulatory Guide 1.183 for the steady-state fission product gap inventories. The new REA regulatory guide (DG-1327) should include these steady-state fission product gap inventories.

The new REA guide is welcome as it formalizes the guidance for the reactivity imitated accidents gap releases (among other criteria). The recommendation in this comment is constructive as it leads to a comprehensive regulatory guide for the REA and will be more efficient for the long-term. This comment recognizes that referencing RG-1.183 for the REA steady-state fission product gap inventory couples the new REA regulatory guide with a regulatory guide under revision. Regulatory Guide 1.183, Proposed Revision 1(DG-1199), is an on-going effort. This new REA guide (DG-1327) should stand be decoupled from RG-1.183.

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