

As of: 2/22/17 2:56 PM
Received: February 17, 2017
Status: Pending_Post
Tracking No. 1k1-8usm-r4ah
Comments Due: February 21, 2017
Submission Type: Web

PUBLIC SUBMISSION

Docket: NRC-2016-0270

Guidance for Implementation of 10 CFR 50.59, "Changes, Tests, and Experiments"

Comment On: NRC-2016-0270-0001

Draft Regulatory Guides: Changes, Tests, and Experiments

Document: NRC-2016-0270-DRAFT-0007

Comment on FR Doc # 2016-30921

12/23/2016

81 FR 94275

(5)

Submitter Information

Name: Daniel Cronin

RECEIVED
FEB 22 2 55
RULES & REGULATIONS

General Comment

Thank you for the opportunity to comment on this proposed revision.

The current 50.59 rule and associated guidance is well established and well understood. It has served the industry and regulator well for two decades. Given this track record, any proposed changes should be carefully scrutinized for potential unintended negative consequences. With this in mind, my comments are as follows:

No objective evidence is provided to justify the need for the proposed changes to RG-1.187.

The staff is attempting to change the interpretation and revise the words of NEI 96-07 in DG-1334. This is an inappropriate use of the Regulatory Guide process.

The new interpretation and attempted rewording of the NEI guidance fails to clarify any "potentially misleading statements". In fact, the proposed changes undermine and muddle the well-established and well-understood wording that has been in place for two decades.

The current wording in Sections 4.3.5 and 4.3.8 of NEI 96-07 are applicable to non-power reactors and provide valuable and well-understood 50.59 guidance to the non-power reactor community. In contrast, the wording changes proposed in DG-1334 eliminate or muddle the applicability to non-power reactors and create confusion thereby greatly increasing the likelihood of misinterpretation.

What is an "effect on the plant that is different"? This proposed change is vague, misleading, and undefined.

SUNSI Review Complete

Templat = ADM-013

E-RIDS = ADM-03

Add = B. Harris (BKHY)
m. Orr (MPO1)

Thank you for considering my comments.