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**Docket:** NRC-2017-0016

Guidance for Developing Principal Design Criteria for Non-Light Water Reactors

**Comment On:** NRC-2017-0016-0001

Guidance for Developing Principal Design Criteria for Non-Light Water Reactors; Draft Regulatory Guide for Comment

**Document:** NRC-2017-0016-DRAFT-0003

Comment on FR Doc # 2017-02298

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## General Comment

What is the legal basis for materially altering Appendix A to 10CFR50 using a low tier regulatory guidance document?

Specifically, I am referring to the exemptions proposed for gas reactor (m-HTGR) - e.g. removing the requirements for a containment.

**SUNSI Review Complete**

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**Add= M. Orr (MPO2)**