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General Comment

I applaud the Staff on this excellent effort in producing the subject guidance for applying the General Design Criteria to advanced reactors. I offer the following comments/observations for consideration.

1. It is unclear to me why "applicants would not need to request an exemption from the GDC in 10CFR Part 50 when proposing PDC for a specific design." Is it the intention of the Staff that the RG represents an interpretation of how the GDC can be satisfied?

2. ADRC 26, Reactivity Control Systems. ARDC 26 replaces "specified acceptable fuel design limits" with "design limits for fission product barriers." Why is "specified acceptable fuel design limits" not similarly replaced throughout the ARDC?

SUNSI Review Complete

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