

As of: 6/12/17 7:56 AM
Received: June 09, 2017
Status: Pending_Post
Tracking No. 1k1-8wv8-txks
Comments Due: June 13, 2017
Submission Type: Web

PUBLIC SUBMISSION

Docket: NRC-2015-0070

Regulatory Improvements for Power Reactors Transitioning to Decommissioning

Comment On: NRC-2015-0070-0178

Regulatory Improvements for Power Reactors Transitioning to Decommissioning; Request for Comment on Draft Regulatory Basis

Document: NRC-2015-0070-DRAFT-0199

Comment on FR Doc # 2017-05141

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General Comment

I propose that the "sum of fractions" equation be revised to be mathematically correct. Please refer to the attached PDF that describes the proposed change.

Attachments

Comment on Part 37 Sum of Fractions Equation

The “sum of fractions” is described in Appendix A of 10 CFR 37 with the following equation:

$$\sum_1^n \left[\frac{R_1}{AR_1} + \frac{R_2}{AR_2} + \frac{R_n}{AR_n} \right] \geq 1.0$$

The equation is mathematically incorrect. The correct formula would read as follows.

$$\sum_{i=1}^n \frac{R_i}{AR_i} \geq 1.0$$

- or -

$$\left[\frac{R_1}{AR_1} + \frac{R_1}{AR_1} + \dots + \frac{R_n}{AR_n} \right]$$