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United States Department of the Interior

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Docketing and Service Branch Nuclear Regulatory Commission Washington DC 20555

Subject: Regulatory Guide 1.139 "Guidance for Residua! Heat

Removal" (ER 78/521)

Gentlemen:

We have reviewed the subject regulatory guide which requires that a system to remove residual heat be provided after a reactor shutdown during normal operation or in the case of an accident. This guidance is directly to the design and operation of new facilities and appears adequate. However, we believe that the Nuclear Regulatory Commission should provide similar guidance on existing facilities and require design and operation modifications on a case-by-case basis for existing facilities. This would provide a uniform standard throughout the industry on both existing and new facilities.

Very truly yours,

John C. Peters

Environmental Specialist

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