

Dear Mike,

I had a chance to review the version of BTP 7-19 R8 prepared for the upcoming ACRS meeting. I have attached some comments where I see inconsistencies within the document, with other regulatory information, and with past practices with operating plant modernization that might be viewed as a surprise by the industry.

I am aware that other groups or individuals are providing comments on technical issues or document usability. I did not repeat similar thoughts I have on these topics.

Regards,

**Mark J. Burzynski**  
CHIEF EXECUTIVE OFFICER

Tel: [+1 \(423\) 834-4455](tel:+14238344455)

Email: [m.burzynski@sunport.ch](mailto:m.burzynski@sunport.ch)

[www.sunport.ch](http://www.sunport.ch)

