

From: [Karl Fleming](#)
To: [Tappert, John](#); [Moore, Scott](#)
Cc: [Afzali, Amir](#); GVCULLEN@energy-northwest.com; Chris.Nolan@duke-energy.com
Subject: [External_Sender] Endorsement of Part 53 letter
Date: Tuesday, May 25, 2021 11:39:09 AM

Dear Mr. Tappert and Moore:

As Senior Technical Lead of the Industry led Licensing Modernization Project I would like to express my full support of the letter sent by representatives of Southern Company, Energy Northwest, and Duke Energy.

as found in the following link:

https://urldefense.proofpoint.com/v2/url?u=https-3A__adamswebsearch2.nrc.gov_webSearch2_main.jsp-3FAccessionNumber-3DML21144A276&d=DwMFAG&c=AgWC6NI7Slwpc9jE7UoQH1_CvyCi3SsTNfdLP4V1RCg&r=hOfUzB-EkIssErqyRI7fMgmugh-UI9PQtoL04Ia3-hM&m=j_7ynn52Btoog1jICsgnQBC

Specifically, this letter recommends that the final rule for Part 53:

- Explicitly includes performance objectives of the regulation in the rule (e.g., frequency and consequence values for events from which Design Basis Accidents are selected and quantitative health objectives).
- Enables the development and deployment of owner-controlled programs for managing the reasonable assurance constituent of the regulatory mission (programmatic requirements, regulatory oversight programs, etc.) while enabling an effective and efficient regulatory inspection and enforcement framework.

Sincerely yours:

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“Where it is not necessary to change, it is necessary not to change.”

— Lucius Cary, 2nd Viscount Falkland