

**From:** [Paese, Richard M](#)  
**To:** [RulemakingComments Resource](#)  
**Subject:** [External\_Sender] FW: Part 53 - Westinghouse Comment on Tech Spec Surveillance Requirements  
**Date:** Wednesday, June 16, 2021 1:59:12 PM

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The following are two comments I have for the 10 CFR Part 53 Rulemaking, Docket ID NRC-2019-0062. I previously sent these to Bill Reckely, but wanted to make sure I also submitted them to the proper rulemaking comments email address.

1. In regards to Technical Specifications, I believe 10 CFR Part 53 should explicitly allow for the case when no SRs are required for a given LCO. In 2019 there was a Vogtle 3&4 LAR that used this approach in relation to digital I&C equipment which have self-test features. For your reference, here is the Vogtle 3&4 LAR I am referring to...  
<https://adamswebsearch2.nrc.gov/webSearch2/view?AccessionNumber=ML19297C791>

We were ultimately successfully in removing all SRs for a given LCO under the Part 50.36 working, but it took a lot of discussion to gain alignment. So, clarifying this allowance in 10 CFR Part 53 would be very beneficial.

2. I wanted to give an example for why certain operational programs may not be required for safety. 10 CFR 53.850 requires a program to assess the impact of aging, cycling loads, etc. Some plants, however, may have very short operational life times (e.g., < 5 years). Westinghouse is looking into the feasibility of an operational life at this order of magnitude. In these cases, the qualified life of the components may be longer than the operational life of the plant. For these cases, it is questionable whether having an aging management program is necessary. In general, Westinghouse believes the operational programs requirements are unnecessarily cumbersome in Part 53, especially the FSF program.

Thank you very much for considering my comment. Your efforts are very much appreciated!

Rick Paese  
Westinghouse

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**From:** Paese, Richard M  
**Sent:** Thursday, May 6, 2021 1:11 PM  
**To:** William.Reckley@nrc.gov  
**Subject:** Part 53 - Westinghouse Comment on Tech Spec Surveillance Requirements

Bill,

Thank you for considering my comment on Tech Specs at today's Part 53 stakeholder meeting. As I stated in the meeting, I believe Part 53 should explicitly allow for the case when no SRs are required for a given LCO. In 2019 there was a Vogtle 3&4 LAR that used this approach in relation to digital I&C equipment which have self-test features. For your reference, here is the Vogtle 3&4 LAR I am referring to... <https://adamswebsearch2.nrc.gov/webSearch2/view?AccessionNumber=ML19297C791>

We were ultimately successfully in removing all SRs for a given LCO under the Part 50.36 working, but it took a lot of discussion to gain alignment. So, clarifying this allowance in Part 53 would be very beneficial.

Thank you again for your time in considering my comment.

p.s. – do you prefer a different method for me to provide comments to you other than email?

Rick Paese  
Westinghouse Electric Company

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