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Advanced Reactor Content of Application Project, "Risk-informed Technical Specifications"

Comment On: NRC-2022-0081-0001

Draft Interim Staff Guidance: Advanced Reactor Content of Application Project, "Risk-informed Technical Specifications"

Document: NRC-2022-0081-DRAFT-0001

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General Comment

The NRC is issuing a large number of complicated documents while expecting comments in a short period of time. There is little question that the NRC is attempting to simply short circuit the process of conducting meaningful reviews and providing comments. I seriously doubt the NRC's actions comply with the Nuclear Modernization Act which makes the NRC's actions of doubtful legality. Stagger the documents out over a reasonable time frame.