

9 Twin Orchard Drive
Oswego, NY 13126
November 21, 2024

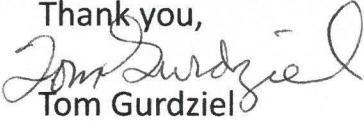
Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Section 53.470 Thoughts (Comments Tom #6)

I don't understand the need for this section: "Maintaining analytical safety margins used to justify operational flexibilities." If a plant owner can accept more restrictive requirements, why not just operate the plant within those requirements? Then the title could be "Maintaining analytical safety margins used to justify operation." Doesn't that make sense? And, is it any different than what the legacy fleet has done for 55 years or so?

Could I also note the complete and total absence of any US NRC approval needed before enjoying this increase in "flexibility", or, any requirements for reportability? It also seems, to me, impossible to easily incorporate into existing design features any changes necessary to acquire the desired flexibility, if only due to present "intellectual property" interpretations.

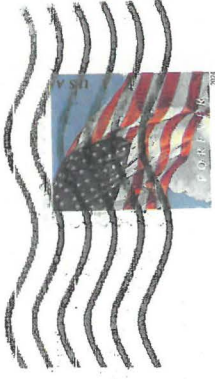
We don't need this section.

Thank you,

Tom Gurdziel

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