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General Comment

There are many items that the inspectors don't inspect.

1. Engineering training. The stations have a lot of young engineers.
2. Non licensed operator training.
3. Effectiveness of the QA program. With the exception of criteria XVI, which the NRC is fixated upon, the NRC does not inspect the other criteria. The QA audit program needs to be inspected. The effectiveness of audits is suspect.
4. The calibration lab is not routinely inspected.
5. Human performance, since their is a large gap on how people do in simulator and JPMs and how they do in the field.
6. Commitment management. The inspectors used to come inspect this and their were always issues. Their are large gaps between what the NRC tracks as a commitment and what the stations have.
7. PRA. I don't know where to start. Do you really think that the PRA issues magically disappear when the stations are not in SDP? Gaps between SPAR and station models exist at all times! The NRC needs to inspect PRA quality, especially credit for operator actions and FLEX.

Please conduct regional workshops before making these changes.
Please ensure the commissioners hold a public meeting to vote on these changes.