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Docket: NRC-2019-0086

Draft Regulatory Guide, DG- 1356, Guidance for Implementation of 10 CFR 50.59, "Changes, Tests, and Experiments"

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Guidance for Implementation of Changes, Tests, and Experiments

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General Comment

Appendix D Section 4.3.6, Step 6, contains the following criteria: "safety analysis no longer satisfies the acceptance criteria identified in the associated safety analysis;" however, this criteria is not acceptable because the NRC has not demonstrated that it maintains the "margin" required by a facilities principle design criteria or any other regulatory requirements for margin. In short, it is not possible for the NRC to have evaluated all of the acceptance criteria in all of the safety analysis reports which are affected by this guidance (against all of the obligated margins); furthermore, there is no NRC statement that it has ever evaluated the acceptance criteria for maintaining obligated margins; therefore, the NRC has no technical basis to claim that meeting the acceptance criteria maintains a licensee's obligations regarding margin. Please publish an NRC evaluation that demonstrates that meeting the acceptance criteria maintains a licensee's obligations regarding margin.