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General Comment

For analogy to digital upgrades in aging nuclear power plants the analog to digital converter (A/D Converter) is a source of errors associated with digital technology. For example, (1) Digitizing Uncertainty - associated with A/D Converters such that sampled signal amplitude at that time divided into a finite number of levels, digital word n bits long. The lower the numbers of bits, greater the digitizing uncertainty; (2) Linearity Error - maximum deviation of the A/D converter from ideal to the actual; and (3) Gain Error - deviation between full scale actual change in input signal and output of the A/D converter. The draft regulatory guide should address these types of errors.