



16 August 2022

Mr. Thomas Hipschman
Chief, Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on NRC Inspection Procedure 71111 Attachment 21N.03. Effective date
01/01/2023

Dear Mr. Hipschman:

As an independent, non-profit organization for the benefit of the public, the Electric Power Research Institute (EPRI) has prepared the attached set of comments on NRC Inspection Procedure (IP) 71111 Attachment 21N.03. The comments suggest referencing current versions of EPRI reports and other documents cited in the inspection procedure, recognizing that detailed original design and manufacturing information may not always be available for items being dedicated, and incorporating separate sections in the IP for included activities that are not part of commercial-grade dedication such as establishing suitability of design, 10CFR50.69 procurements, and procurement of items from suppliers with 10CFR50, appendix B-compliant QA programs.

EPRI would appreciate the opportunity to meet with NRC to discuss these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marc H. Tannenbaum'.

Marc H. Tannenbaum
Senior Technical Executive

PT- 08162022-207/mht

Attachment

c: A. Armstrong, NRR/DRO/IQVB, NRC
E. Brown, NRR/DRO/IQVB, NRC

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