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P. Kadambi

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From: James Lieberman
To: Carol Gallagher, N.P. Kadambi
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Subject: public comment on guidelines for performance based activities

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RULES & DIR. BRANCH
US NRC

Please consider this a public comment. on the January 24, 2000 Federal Register notice.

NRC should add as a guideline that any new regulation of standard be inspect able. The guidance addresses incorporation into the regulatory framework. It says framework includes CFR, Regulatory Guides, ... or inspection guidance. My specific guidance is that the "or" should be "and" It is mandatory that inspection guidance be considered up front. The agency policy is to do that but the agency generally honors it in the breach. It has been my experience that issues for implementation and inspection, and for that matter enforcement, is considered after the rule is proposed and often finalized. These should be front end considerations.

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Please contact me if you desire more explanation these comments.