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General Comment

The proposed rule states: The formation of cladding crud and oxide layers is an expected condition at nuclear power plants. It also states: Paragraph (g)(2)(ii) would be added to include a requirement to evaluate the thermal effects of crud and oxide layers that may have accumulated on the fuel cladding during plant operation.

This is Paragraph (g)(2)(ii):
(ii) The thermal effects of crud and oxide layers that accumulate on the fuel cladding during plant operation must be evaluated. For the purposes of this paragraph, crud means any foreign substance deposited on the surface of fuel cladding prior to initiation of a LOCA.

Paragraph (g)(2)(ii) must be augmented as follows:
(ii) The thermal effects of crud and oxide layers that accumulate on the fuel cladding during plant operation must be evaluated. The thermal effects of crud and oxide layers must be evaluated based on the observed crud and oxide layers that are present on the fuel cladding at the start of the forthcoming operating cycle, and in addition, the projected changes in the crud and oxide layers during the course of the forthcoming operating cycle must also be included in order to provide an accurate evaluation. For the purposes of this paragraph, crud means any foreign substance deposited on the surface of fuel cladding prior to initiation of a LOCA.