

# PUBLIC SUBMISSION

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**Docket:** NRC-2008-0332  
Performance-Based ECCS Cladding Acceptance Criteria

**Comment On:** NRC-2008-0332-0060  
Performance-Based Emergency Core Cooling Systems Cladding Acceptance Criteria

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## General Comment

The 2200F peak cladding temperature (PCT) limit and the Baker-Just correlation.

Performance-Based Emergency Core Cooling Systems Cladding  
Acceptance Criteria; Proposed Rule and Three Draft Guides

The proposed rule reaffirms the use of the Baker-Just correlation and the 2200F PCT limit. The very complex proposed rule and the three draft regulatory guides avoid experiments with multi-zirconium-rod assemblies. If such experiments were performed, the necessity for a much lower PCT limit than 2200F would be confirmed.

The proposed rule is providing a path for moving the 2200F PCT limit into another regulatory guide.