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Docket: NRC-2017-0236
Preparing to License Accident Tolerant Fuel

Comment On: NRC-2017-0236-0001
Preparing to License Accident Tolerant Fuel

Document: NRC-2017-0236-DRAFT-0009
Comment on FR Doc # N/A

Submitter Information

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General Comment

Please see attached file regarding the licensing of Accident Tolerant Fuel. General Atomics appreciates the effort the NRC is taking to support this important mission.

Attachments

ATF Project Plan ltr_020518_GA

(9)
82 FR 60633
12/21/2017

SUNSI Review Complete
Template = ADM - 013
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Add= Andrew Proffitt (JA-P5)



February 5, 2018

Ms. May Ma
Office of Administration
Mail Stop: OWFN-2-A13
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Submitted via Regulations.gov

Subject: Submittal of General Atomics comments on "Draft Project Plan to Prepare the U.S. Nuclear Regulatory Commission to License and Regulate Accident Tolerant Fuel", 82 *Federal Register* 60633, 12/21/2017 (Docket ID: NRC-2017-0236)

Dear Ms. Ma:

General Atomics (GA) is providing this letter in response to the NRC request for comment on "Draft Project Plan to Prepare the U.S. Nuclear Regulatory Commission to License and Regulate Accident Tolerant Fuel." GA has been an active participant in the NRC and industry meetings on Accident Tolerant Fuel (ATF) and endorses the comments provided by the Nuclear Energy Institute (NEI).

As part of GA's commitment to nuclear technology and materials development for both the existing light water reactor (LWR) fleet and emerging advanced reactors, GA has invested time and resources into the development of silicon carbide (SiC) composite materials. This SiC composite in the form of LWR cladding has enormous potential as an ATF candidate technology. With regard to the licensing of this ATF technology, GA emphasizes the following key points, which are consistent with the NEI comments:

- In order to realize the benefits of ATF technologies within the remaining lifetimes of the existing nuclear fleet, the licensing timeline must be shortened as much as possible. In particular, the development of independent computational models and tools imposes an unnecessary delay as presented in the project plan. By more closely aligning with DOE and national labs, the NRC can leverage the modeling and simulation capabilities while maintaining an independent confirmatory process through regulatory review.
- Each ATF concept is unique and should be evaluated on its own merits rather than being binned into two broad categories, which may penalize technologies with the greatest benefit.

If you have any questions or require additional information, please feel free to contact me at (858) 455-2025.

Best Regards,

A handwritten signature in black ink that reads "Christina Back". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Christina Back, Ph.D.
Vice President, Nuclear Technology and Materials
Energy Group