

# PUBLIC SUBMISSION

<b>As of:</b> 7/25/18 12:43 PM
<b>Received:</b> July 23, 2018
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1k2-94fr-v7l3
<b>Comments Due:</b> July 23, 2018
<b>Submission Type:</b> Web

**Docket:** NRC-2018-0109

Draft Letter to the Nuclear Energy Institute Regarding the Clarification of Regulatory Paths for Lead Test Assemblies

**Comment On:** NRC-2018-0109-0002

Draft Letter to Nuclear Energy Institute Regarding Clarification of Regulatory Paths for Lead Test Assemblies

**Document:** NRC-2018-0109-DRAFT-0216

Comment on FR Doc # 2018-14121

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## Submitter Information

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## General Comment

I can find no discussion in the clarification letter that addresses explicitly the issues of fuel handling accidents (FHAs) for lead test assemblies(LTAs) and accident tolerant fuel (ATF). FHA may, in fact, be the most limiting accident for LTAs/ATF, particularly since these out-of-core events have fewer barriers to release, control room dose, and public exposure. Additional risk would be presented for criticality and dose involving enrichments greater than 5% U-235.

SUNSI Review Complete Template = ADM-013

E-RIDS=ADM-03

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COMMENT (226)

PUBLICATION DATE: 6/7/2018

CITATION # 83 FR 26503