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# PUBLIC SUBMISSION

**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-0243

Comment on FR Doc # 2018-14121

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## Submitter Information

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## General Comment

The NRC clarification letter fails to address the use of topical reports in establishing NRC approval of codes and methods. All lead test assembly (LTA) analysis for accident tolerant fuel need to be supported by NRC-approved methods via approved versions of topical reports.

The Advisory Committee on Reactor Safeguards (ACRS) should review each LTA concept and report to the Commission on its support for approval and/or recommendations for further analysis, conditions and limitations, and any failings in regulatory positions associated with the subject topical reports.

SUNSI Review Complete Template =

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ADD= Sihan Ding, Kimberly Green & Janet Burkhardt

COMMENT (253)

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