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

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

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General Comment

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Model TS to Facilitate Fuel Reconstitution

The model technical specification published for adoption by Generic Letter 90-02 added changes that allow the substitution of Zircaloy-4 or stainless steel filler rods or open water channels for fuel rods in fuel assemblies if justified by cycle-specific reload analyses using an NRC-approved methodology. The requirement to use an NRC-approved methodology was used to confirm conformance to existing design limits and the safety analysis criteria. Thus ensuring that the allowed changes to fuel assemblies would not have a significant effect on safety. These changes were offered solely for the purpose of providing flexibility in the repair of fuel assemblies containing damaged and leaking fuel rods by reconstituting the assemblies. Simply stated, the technical specification changes were designed to facilitate fuel reconstitution and did not state or imply any broader applicability.

NRC approved methodologies are required to be used for all fuel assemblies including any assemblies being used to perform representative testing. No exception to this is included in TS 4.2.1. This is also required by the COLR technical specification. This was and is the method of providing safety assurance for LTAs. NRC review and approval of any method by a license amendment is the only alternative to analysis using codes and methods already approved and included in the COLR.