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To: [SHAW Donis \(ORANO\)](#)
Cc: [Tate, Travis](#); [McKirgan, John](#)
Subject: Graded Approach---Clarification Questions--FQTs
Date: Tuesday, August 20, 2019 8:21:00 AM
Importance: High

Good morning Don,

The staff reviewed the draft submittal for the graded approach. In general, forms 77-99, which enveloped all evaluations about the FQTs, seem to be acceptable. However, there are a few questions that need further clarification from the applicant:

1. The unidentified cells in Figure 1-4b of the TS. Are those cells not be loaded or something else?
2. The method to deal with outlier fuel assemblies that is not covered by the new approach. The response to the RAI SH-1 states that the approach for qualifying the outliers has been approved in amd. 15 and will not be repeated in the response to the RAI. However, the information in the applicable TS for amd. 15 does not seem to be included in the TS for amd. 16. The staff needs to understand where this information resides. Because each amd. of a 10 CFR Part 72 CoC is a standalone document, the method for qualifying the outliers must be repeated in the TS if it is part of the graded approach. **The staff is unable to find the method in the TS for amd. 15.**

(To include the treatment of outliers, the applicant needs to use the approach identical to the approach identical to one used in amd. 15 that has been approved or the approach the applicant and the staff agreed upon for EOS amd. 1, which includes Table 7A, Table 7B, and Table 7C of the proposed TS.)

Please let me know if you have any questions. I would like to resolve the issues as soon as possible.

Thanks,

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