

April 12, 2004

MEMORANDUM TO: Jared S. Wermiel, Chief  
Reactor Systems Branch  
Division of Systems Safety Analysis  
Office of Nuclear Reactor Regulation

FROM: Jack E. Rosenthal, Chief **/RA/**  
Safety Margins and Systems Analysis Branch  
Division of Systems Analysis and Regulatory Effectiveness  
Office of Nuclear Regulatory Research

SUBJECT: UNSOLICITED COMMENTS FROM THE PENNSYLVANIA STATE  
UNIVERSITY ON EPRI LICENSING TOPICAL REPORT ON  
REACTIVITY INITIATED ACCIDENTS

Attached is a review of the Critical Strain Energy Density model used by EPRI in their licensing topical report on reactivity-initiated accidents that is under review in your branch at this time. These unsolicited comments were sent to us by Professor Arthur T. Motta of The Pennsylvania State University. Prof. Motta attended the ACRS meeting last fall, at which time the EPRI report was discussed. He then obtained a copy of that publicly available document.

We have a current grant with Prof. Motta to study the mechanisms of cladding failure under transient conditions and we believe that he is well qualified in this field. However, the scope of our grant does not include providing comments on the EPRI report, and the comments were neither requested nor suggested by NRC staff. Nevertheless, the comments may be helpful in completing the review of the EPRI document, so we are providing it to you promptly.

Attachment: As stated

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