

From: "Brian Gutherman" <bgutherman@acines.com>
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Subject: Additional 50.68 Comment

George,

One more licensee offers the following comment on the technical basis for the 50.68 rule change:

In several locations the discussion refers to criticality monitoring required by 72.124 for detection of an inadvertent criticality event. Two issues arise:

1. 72.124(c) specifically exempts underwater criticality monitoring when the SNM is under water shielding (as well as when the fuel is in a cask in its stored configuration). The cask under water is exactly the time when a criticality event due to a boron dilution event is postulated.
2. Based on the above, most, if not all licensees have no criticality monitors installed that would detect an inadvertent criticality as the rulemaking text suggests.

Please call me if you have any questions. I will be at NEI on 9/22, so use my cell that day.

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