

Industry Discussion on Draft Rule Language

**Public Workshop - 10 CFR 50.46(b)
ECCS Performance Requirements**

April 28, 2010

Draft Rule Language

- **Basic Purpose of Rule Change**
 - Risk Informed
 - Performance Based
 - Product/Technology Neutral

ANPR Objective 1

- ***Objective 1: Expand the applicability of §50.46 to include any light-water reactor fuel cladding material***
 - **Agree with objective**
 - **Retains some details**
 - **Appears to require future rulemaking**

ANPR Objective 2

- ***Objective 2: Establish performance- based requirements and acceptance criteria specific to zirconium-based cladding materials that reflect recent research findings***
 - **Agree with performance- based requirements**
 - **Prescriptive limits in draft rule**
 - **Rule should accommodate recent and future research data**
 - **Extended time out-of-phase with science**
 - **Will lead to future rulemaking**

ANPR Objective 3

- ***Objective 3: Revise the LOCA reporting requirements***
 - **Value of reporting**

ANPR Objective 4

- ***Objective 4: Address the issues raised in PRM-50-84, which relate to crud deposits and hydrogen content in fuel cladding***
 - **CRUD addition to LOCA evaluation models**

Industry Recommendations

- **Rule should be independent of fuel design**
 - **Focus on general performance requirements**
 - **Specific details should be in guidance documents**
 - **Eliminate exemptions for alternate fuel forms and cladding**

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