NUCLEAR ENERGY INSTITUTE

DG-1327 Public Comment Disposition

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Issue Overview

- Dose
- Comment Resolution
- Forward Fit
- Work Scope

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Dose Assessment

- Changes to Non-LOCA Dose Assessment - Not Appropriate to DG-1327
  - Fission Product Release Fraction in DG-1327 should only be applicable to CRE/CRDA
  - Revise other regulatory guidance as appropriate, such as RG 1.183 or 1.195
- Changes to AST Governed by 10CFR50.67(b)
  - New CRE/CRDA calculation creates 10CFR50.67 potential AST issues

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Comment Resolution

- Section C.1.2
  - Comment C
  - Comment D
    - Prompt vs. 5% power threshold issue.
    - What does “at power limits becomes questionable” mean?
- Section C.1.3
  - Comment C
    - Dismissing the transition temperature phenomenon (PWR vs BWR)

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Comment Resolution

- Section C.2.1.1
  - Comment A
    - Test are Inherently Conservative; not representative of actual operation. Recent changes to curve fits of Figures 2 & 4 in DG-1327 adds conservatism at lower Hydrogen levels. Revised technical basis for DG-1327 is missing.
  - Comment B
    - Is Non-LOCA Realistic/Best Estimate Allowed or Not?
- Section C.2.2.3
  - Comment A-F
    - Additional Workshop to flesh out Work Scope

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Comment Resolution

- Section C.2.3.4
  - Comment C
  - How can we reference a Draft Reg. Guide 1.224
- Section C.2.3.5
  - Comment B
  - Hydride reorientation, imposing beyond existing analyses
- Section 3.1
  - Comment C, E
  - Additional Workshop to flesh out Work Scope

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Comment Resolution

- Section 3.2
  - Comment F, H-K
  - Mechanical Properties vs. In-Pile
- Section 3.3
  - Comment A-B
  - Fuel cladding failure is conservatively presumed….

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Dose Assessment

- Page 53 comment table
  - Comment F, H-K
  - No Response Provided

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Forward Fit / Implementation

- When Should Forward Fit Be Applied?
  - Possible Areas - When 50.59 indicates an LAR in needed, and touches:
    - NUREG-800, SRP-4.2 (Fuel System Design) (Sans PAD5 related stuff)
    - NUREG-800, SRP-15.4.8, (Spectrum of Rod Ejection Accidents (PWR))
    - NUREG-800, SRP-15.4.8.A, (Radiological Consequences of Rod Ejection Accident (PWR))
    - NUREG-800, SRP-15.4.9, (Spectrum of Rod Drop Accidents (BWR))
    - NUREG-800, SRP-15.4.9.A, (Radiological Consequence of Rod Drop Accident (BWR))
    - Reg. Guide 1.183; 1.195
- Example LAR
  - Fuel Transition with a Specific Change of Methodology (i.e., 3D methods)
- Availability of Approved Methods
  - Not every vendor in the same position right now

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Work Scope

- Additional Public Workshop to Discuss Scope
  - Everyone on the same page

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Questions?? / Discussion