

PUBLIC SUBMISSION

SUNSI Review Complete
Template = ADM-013
E-RIDS=ADM-03
ADD= Sihan Ding, Kimberly
Green & Jan Burkhardt

COMMENT (67)
PUBLICATION DATE:
6/7/2018
CITATION # 83 FR 26503

As of: 7/6/18 8:20 AM
Received: July 06, 2018
Status: Pending_Post
Tracking No. 1k2-9446-cr0v
Comments Due: July 23, 2018
Submission Type: Web

Docket: NRC-2018-0109

Draft Letter to the Nuclear Energy Institute Regarding the Clarification of Regulatory Paths for Lead Test Assemblies

Comment On: NRC-2018-0109-0002

Draft Letter to Nuclear Energy Institute Regarding Clarification of Regulatory Paths for Lead Test Assemblies

Document: NRC-2018-0109-DRAFT-0063

Comment on FR Doc # 2018-14121

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General Comment

The nuclear industry seeks ways to cut its costs. It is hoping that new fuel designs, called Accident Tolerant Fuel, will enable them to significantly reduce costs.

Some ATF designs feature fuel pellets made of material other than the traditional uranium dioxide.

Some ATF designs feature fuel rods made of material other than the traditional zircaloy.

For decades, the industry has developed new fuel designs that the NRC allowed to be implemented via a tried and true process. Owners would submit license amendment requests to the NRC seeking approval to load a small number of Lead Test Assemblies (LTAs) into the reactor cores. If these small, NRC-approved tests proved successful, the tested fuel designs could be used more broadly.

Sometimes, the new fuel designs required exemptions from certain federal regulations. In that case, owners would apply to the NRC for the exemptions.

Now, the NRC proposes to turn it all over to the industry. No license amendment requests (hence, no opportunity for public intervention) and no exemption requests. This is absolute insanity. There are so many accidents that took years to find out about, leading to deaths after so long a period that there was no way to keep the people alive long enough so that they could use their right to sue.

If the unapproved experiments in people's backyards work, the industry hopes to realize significant savings. For example, some of the ATF designs seek to lessen the amount of hydrogen gas generated during accidents. Commendable goal. But if achieved, the industry will seek to eliminate hydrogen control measures at their

plants (and the costs of maintaining them). Also, some ATF designs take longer to heat up to the melting point. If so, owners will likely seek to relax response times for emergency power systems and emergency makeup cooling systems.

NRC staffers have formally opposed this NRC plan, or scheme, or gambit. Harold Chernoff wrote a non-concurrence against the draft letter. He was aided by another NRC staffer who retired this past spring. A third NRC staffer filed a Differing Professional Opinion against the plan, scheme, or gambit. His or her DPO remains open, so it is not public and his or her identify is not known publicly.

It is imperative that NRC hear as many voices as possible opposing unreviewed and unapproved fuel tests in the nuclear power plants in their communities.