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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

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General Comment

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.

Lead test assemblies are a necessary and important step in the fuel development process and have led to safety improvements in the design of nuclear fuel, such as improved resistance to corrosion, improved thermal-hydraulic performance, increased heat transfer properties, and reductions in the number of leaking fuel pins. New features of LTAs can include design and/or material changes to the fuel, cladding, or other parts of the fuel assembly. For example, an LTA may be nearly identical to the co-resident fuel except for a new fuel filter design, or an LTA may be an assembly with a completely different design and materials.

Do not cut out these safeguards, it is critical to everyone's health and survival. I support Harold Chernoff's views.

Thank you.
Caroline Courtright