

# PUBLIC SUBMISSION

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**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

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Comment on FR Doc # 2018-14121

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## General Comment

The NRC is proposing to set aside federal regulations and deprive members of the public their legal rights by using a letter to the Nuclear Energy Institute to permit nuclear plant owners to experiment with new fuel pellets and fuel rods in the nuclear power reactors in our backyards without prior NRC review and approval, and without your getting a chance to agree or disagree with the experiment.

I believe the draft letter must not be finalized and issued. I agree with the reason for the draft letter the need to clarify regulatory expectations for the insertion of Lead Test Assemblies in operating reactor cores. That objective should be achieved through appropriate means, not via a letter to the industry trade group. It is an entirely inappropriate means for communicating regulatory expectations on safety regulations protecting workers and the public.

I personally support Harold Chernoff's views which were provided to the Director and Deputy Director DIRS on April 16, 2018.