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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

LTAs 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.