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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

Document: NRC-2018-0109-DRAFT-0142

Comment on FR Doc # 2018-14121

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General Comment

Comments on Draft Letter to the Nuclear Energy Institute Regarding the Clarification of Regulatory Paths for Lead Test Assemblies, [NRC-2018-0109] as published June 7, 2018, in the Federal Register, pp. 26503-26505

San Luis Obispo Mothers for Peace asserts that the Generic Letter 90-02 prepared by the Nuclear Regulatory Commission to NEIS regarding changes in the number of fuel assemblies, the type of cladding of all fuel assemblies, and the fuel type in assemblies in nuclear power reactors must not be finalized and issued. Any changes to these three very important rules must be applied for through the License Amendment process as specified in 10 CFR 50.90. Mothers for Peace agrees with the reason for the draft letter the need to clarify regulatory expectations for the insertion of Lead Test Assemblies in operating reactor cores. But that objective should be achieved through appropriate means, not via a letter to the industry trade group.

San Luis Obispo Mothers for Peace also fully supports the detailed comments submitted by David Lochbaum and Edwin S. Lyman on behalf of the Union of Concerned Scientists on June 27, 2018.

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ADD= Sihan Ding, Kimberly Green & Janet Burkhardt

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