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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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Comment on FR Doc # 2018-14121

Submitter Information

Name: Anonymous Anonymous

General Comment

The regulatory paths described in the proposed NRC clarification letter lack any credible evaluation of radiological dose to workers (TEDE), changes in effluents and offsite doses for normal operations, abnormal occurrences, and postulated accidents. Additionally, there is no evaluation of criticality, storage, or transportation. I strongly oppose all provisions of the clarification letter concerning Technical Specification 4.2.1, exemptions, and 10 CFR 50.59.

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ADD= Sihan Ding, Kimberly Green & Janet Burkhardt

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