

As of: 7/25/18 9:43 AM
Received: July 23, 2018
Status: Pending_Post
Tracking No. 1k2-94fn-ic5t
Comments Due: July 23, 2018
Submission Type: Web

PUBLIC SUBMISSION

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

Document: NRC-2018-0109-DRAFT-0201

Comment on FR Doc # 2018-14121

Submitter Information

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General Comment

I fully endorse the positions stated in Mr. Chernoffs non-concurrence. The positions stated by Mr. Chernoff are logical, coherent, and fully consistent with the regulations and precedence. The NRCs response to the non-concurrence (see pdf pages 72 through 85 of ML18151B016), offers weak, misleading, and unconvincing arguments to support the positions stated in the draft letter to NEI. The regulatory framework in the draft letter is not legally justified. As such, the draft letter to NEI should be revised in a manner consistent with the regulatory framework discussed by Mr. Chernoff in his non-concurrence and the memo to the NRCs General Counsel dated March 22, 2018, including its enclosures.

SUNSI Review Complete Template = ADM-013
E-RIDS=ADM-03
ADD= Sihan Ding, Kimberly Green & Janet Burkhardt

COMMENT (211)
PUBLICATION DATE: 6/7/2018
CITATION # 83 FR 26503