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# 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-0203

Comment on FR Doc # 2018-14121

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## Submitter Information

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## General Comment

Pages 2 through 4 of the NRCs draft letter to NEI discuss the interpretation of the language in Standard Technical Specification (STS) 4.2.1, Fuel Assemblies. This interpretation is contrary to a plain language reading of the STS 4.2.1 as well as a substantial history of license amendments and other NRC documents. In accordance with typical plain language writing guidance: (1) a paragraph should be about one topic; (2) each paragraph should start with a topic sentence that captures the essence of everything in the paragraph; and (3) the main idea should be placed before exceptions and conditions.

This draft letter should not be issued.

SUNSI Review Complete  
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ADD= Sihan Ding, Kimberly  
Green & Janet Burkhardt

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