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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-0211

Comment on FR Doc # 2018-14121

Submitter Information

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General Comment

Regarding technical specification (TS) 4.2.1, the NRC staffs description of the meaning of the sentences is egregiously incorrect and nonconservative. All provisions of TS 4.2.1 apply collectively to all fuel loaded in the reactor. The NRC is irresponsible in its interpretation of these license requirements, especially the assertion that the lead test assembly (LTA) can be treated independently from the prior provisions. Where is the NRCs moral compass?

NRC funding and fee recovery needs to change. The NRC is clearly in bed with the industry on this issue and is complicit in its responsibility to the public.

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COMMENT (221)

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