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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

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General Comment

I strongly object to the assertion that NRC will rely on licensee good engineering judgment as long as it does not invalidate the final safety analysis or accident analysis. It is not apparent what this means! Is 99% invalidation acceptable? Is 10%, 50%, or 75% invalidation acceptable? What is the lead test assembly is not applicable to the current analysis or is not bounded by RC-approved codes and methods? Do we need another accident for the NRC to be responsible in doing its job?

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ADD= Sihan Ding, Kimberly Green & Janet Burkhardt

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