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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-0229

Comment on FR Doc # 2018-14121

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## General Comment

Using a letter is not a good way to inform the public of the NRC's policy. This policy is very different than the policy described in Generic Letter 90-02. It only discussed fuel reconstitution and there is no information in it that would address use of different clad material or different fuel material. It said that the limited number of fuel assemblies would be based on NRC approved generic topical reports with slight changes to accommodate filler rods.

This change in policy could have a significant impact on the public and should be given more opportunity for public input so that experts can explain the change and receive input from the public and outside technical experts. As expected, fuel vendors and industry organizations are supportive of the idea that NRC review of using new design fuel is not required. NRC staff should not exclude members of the public from deliberations on this important topic.

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