

NIMA ASHKEBOUSSI

Sr. Director, Fuel Cycle and Radiation Safety Programs

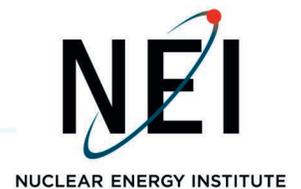
1201 F Street, NW, Suite 1100

Washington, DC 20004

P: 202.739.8022

nxa@nei.org

nei.org



August 5, 2021

Mr. Joseph Donoghue
Director, Division of Safety Systems
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft NRC Accident Tolerant Fuel Project Plan Version 1.2

Project Number: 689

Dear Mr. Donoghue:

On behalf of the nuclear energy industry, the Nuclear Energy Institute¹ (NEI) submits the attached comments on the draft NRC Accident Tolerant Fuel (ATF) Project Plan Version 1.2, supplementing the industry comments made during the NRC public meeting on July 22. Industry appreciates the NRC's commitment to develop the ATF Project Plan and the efforts to be prepared to review industry submittals. Industry views the Project Plan as an important document outlining the issues needed for consideration and the regulatory priorities for NRC. We appreciate the NRC hearing industry's focus on deploying higher burnup fuels, our timelines, and being responsive to incorporating these activities into the Project Plan. In Industry's view, it is important that the project plan be appropriately scoped to avoid an unnecessary focus on activities that are not needed to support future reviews. In addition to the detailed comments in the attachment, we offer the following comments and areas to focus on as you finalize the Project Plan.

NRC Should Thoroughly Review and Incorporate Industry Comments into this Revision

Industry understands that NRC intends to finalize Version 1.2 before the end of the fiscal year. The revision contained significant changes to the Project Plan, including an overhaul to Appendix A that provided an assessment of the regulations and guidance that are potentially impacted by ATF concepts, higher burnup, and increased enrichment and outlines potential NRC or Industry actions to address the issue to closure. Industry does have significant comments for consideration that may take longer to review, resolve, and incorporate into the Project Plan than the NRC's current timeline for completion allows. If NRC finds merit in the comments provided, we believe it is important to take the time now, and not wait for the next revision,

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

Mr. Joseph Donoghue

August 5, 2021

Page 2

to incorporate these comments into the Project Plan rather than issue the document due to an arbitrary completion date. In the future, we request that stakeholder engagement occur sooner in the process to avoid situations where comments cannot be addressed due to time constraints around issuance.

NRC Should Prioritize Efforts to Generically Evaluate Environmental Impacts

The NRC staff has identified the need for licensees to submit complete descriptions of the potential environmental impacts of their amendment requests and has identified the review of these environmental impacts as a "source of additional complexity resulting in additional schedule risk." Industry sees a clear environmental benefit to deploying higher burnup fuels, including the ability to extend operation cycles, reduce batch reload sizes, reduce the overall number of outages, reduce transportation requirements for the front-end and back-end, and reduces spent fuel. We encourage the NRC to prioritize the generic evaluation of the environmental impacts now. Industry is ready to support any informational needs to support NRC in this effort.

The Project Plan Should be More Responsive to the Use of Risk-Informed Application

Both the NRC and Industry are seeking to transition away from the traditional path and timelines that have historically been associated with licensing new fuel products. In line with NRC's Transformation efforts to utilize risk-insights, Industry intends to utilize risk methodologies in submittals in manner not previously used for fuel licensing. Specifically, the Project Plan should include more information about the use of risk informed submittals and any special considerations for these types of submissions. Additionally, the Industry intends to continue to pursue the use of xLPR and alternate licensing strategy to address issues associated with fuel fragmentation, relocation, and dispersal. The Project Plan should specifically address these areas.

NRC Should Clarify its Inclusion of Doped Pellets Within Appendix A

The Regulatory Framework Applicability Assessment conducted in Appendix A contains a column pertaining to doped pellets. Industry has successfully licensed and deployed doped pellets into reactors in the U.S. The pathway for licensing these products is well understood and its inclusion in the Project Plan has created confusion. The NRC should clarify the intent of this column. Industry's expectation is that this column is only applicable to increased enrichment and/or higher burnup doped pellet applications.

NRC Should Clearly Indicate that the Project Plan is Not Regulatory Guidance

The revisions provided in Appendix A are significant and outline staff's evaluation of the regulations and guidance that are applicable to ATF, higher burnup, and increased enrichment applications and where there may be applicability or data gap issues. Additionally, Appendix A outlines NRC's position on "information needs from the industry" which are highlighted in blue. While the information in the Project Plan is useful in understanding NRC's thoughts on certain issues, the addition of industry actions may create the perception that the NRC is providing regulatory guidance or an expectation for information. Appendix A should be noted to be informational only and reviewers should not hold applicants to the actions colored in blue.

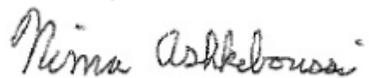
Mr. Joseph Donoghue

August 5, 2021

Page 3

We appreciate your consideration of these comments and would like to see an NRC comment resolution table to understand how these items are dispositioned. Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Nima Ashkeboussi".

Nima Ashkeboussi

Attachment

c: Andrea Kock, NRR, NRC
Michael Wentzel, NRR, NRC
NRC Document Control Desk

Attachment: Industry Comments to the Draft ATF Project Plan V1.2

	Section	Comment	Recommendation/Action
1.	General	The project plan contains no evaluation of risk informed fuel applications such as the Alternative Licensing Strategy described in EPRI 3002018457. RG 1.174 only provides broad guidance related to the evaluation of defense-in-depth and design margins without consideration of the relative risks of the proposed licensing change.	Include more information in the document about the use of risk informed applications for submittals and any special considerations for these types of submissions.
2.	General/Section 7.3, Page 25, “Additional Considerations”	Section 7.3 notes the need to address environmental impacts for increased enrichment and burnup applications and notes that the “staff may need to consider if it is possible to generically evaluate the environmental impacts.” There is a very clear environmental benefit to deploying higher burnup fuels including the ability to support extended operating cycle lengths, reduced batch reload sizes, fewer fuel shipments, reduced uranium mining, and less spent fuel generated.	We encourage the NRC to begin the evaluation of environmental effects of higher burnup/enrichment promptly on a generic basis and incorporate this into the Project Plan. To maximize generic applicability, the industry is prepared to share expected Burnup and Uranium Enrichment requirements for a range of cycle energy plans and reactor types as needed.
3.	Pg. 5	The document makes mention of near-term and long-term burnup thresholds. Industry considers both the move up to 68 GWd and 75 GWd to be near-term activities achievable in the mid-2020s even if we may be implementing them sequentially.	Clarify NRC’s definition of long-term or revise terminology.
4.	Section 3.2, Pg. 9	How does the risk informed framework for applications within fuel licensing fit within the improved fuel licensing paradigm?	What are the expectations – discussion on guidance related to a risk informed technical basis may be what is warranted within this section.
5.	Section 3.2.3. Page 10, last paragraph	The described scope of a PIRT extends to the “full intended use” of a given ATF concept, not just its initial licensing application. This approach may represent a wise use of NRC resources but requires extrapolation to future, as yet undefined industry applications.	Clarify the project plan so that PIRT results related to approval for batch reloads be segregated from those needed to credit enhanced safety performance. This will limit the necessary industry and regulatory resources to address phenomena that are applicable to a given LAR.

Attachment: Industry Comments to the Draft ATF Project Plan V1.2

6.	Section 3.2.4.1	This section outlines the need for high quality submittals to meet review timelines with a footnote defining “high quality.” That definition refers to quantities of data.	Expand on this a little more to include what a high quality, risk-informed licensing submittal would look like and what “quantities of data” means.
7.	Section 7, Page 23, “TASK 1: 10 CFR PART 50, 10 CFR PART 52, AND 10 CFR PART 100 REGULATORY FRAMEWORK, INREACTOR PERFORMANCE”	This section highlights the GDC, noting that “the intent of these principal design and performance requirements should be satisfied” even if verbatim compliance cannot be met.	NRC should clarify the use of exemptions for this space.
8.	Section 7, under Task 1, second paragraph	The NRC separates batch-loading of ATF from crediting safety enhancements of ATF and states “the staff anticipates that such changes will need to be made to address batch loading before making changes needed to credit the safety enhancement of ATF in the licensing basis.” The statement seems to be indicating that the NRC will not be ready to review applications that also contain a request to credit the safety enhancements for ATF materials.	Please clarify whether or not this means safety enhancements for ATF materials can be licensed in the near-term. The NRC should not co-mingle any gaps associated with the implementation of ATF and any potential future requests for safety enhancements.
9.	Section 7.2/Appendix B	Under Licensing Pathways we would like to see more information in here and in Appendix B that addresses the use of exemptions in the licensing process and how the staff sees that as part of any submittal.	Provide additional information on the use of exemptions in the licensing pathways and any staff considerations.
10.	Section 7.3, page 25	This section states “each LAR review would need a full description and detailed analysis performed by the staff of the environmental effects of transportation of fuel and waste to and from the reactor for these higher enrichment and burnup levels.” Is this an expectation for LTAs in addition to batch reloads? If both, is it possible to apply a graded approach?	Clarify this section for LTAs and, if applicable, provide information on a graded approach for LTAs with increased enrichment and burnup.

Attachment: Industry Comments to the Draft ATF Project Plan V1.2

11	Section 7.3, page 26, under, “Additional Considerations”	The last sentence in section 7.3 has a typo “hav” should be “have”.	Editorial correction
12	Section 7.4, Lead Test Assemblies	This section discusses the NRC-issued guidance letter relative to performing LTA programs under 10 CFR 50.59. In preparation for higher enrichment and higher burnup, it is recognized that an LAR will be required to support such LTA programs. However, it is not clear if a limited scope higher enriched, higher burnup LTA program will require consideration of many of the other regulatory items identified within the Project Plan such as a revised Environmental Assessment.	Please provide additional clarification on the regulatory expectations for a higher enrichment, higher burnup LTA program.
13	Section 8.1.4.1	Industry intends to leverage the Oak Ridge Report on utilizing the existing certified packages for LEU+ transport with a future submittal. The Project Plan should address the need for NRC to collaborate with their foreign counterparts on the issue UF6 shipments greater than 5%.	Project Plan should address the need for coordination with foreign counterparts on LEU+ transport.
14	Section 8.1.4.1, Page 33, under “Challenges for Transportation of Uranium Feed Material and Unirradiated Fuel”	Paragraph 1, second sentence states “Transportation of UF6 enriched to greater than 5 weight percent...”. We believe this sentence is missing the word “or” and “and.” The sentence should describe the need for new package designs or modifications of existing designs and exemptions if moderator exclusion credit is sought.	Suggested edit: “Transportation of UF6 enriched to greater than 5 weight percent will require the design and certification of new Packages <u>or</u> the modification of currently existing approved packages <u>and</u> an exemption...”
15	General - Appendix A, Page A-1	The introduction to Appendix A should include a statement that this table is for informational purposes and does not supersede or create any new regulatory requirements, guidance, or NRC expectations.	Added language along the lines provided in the comment.
16	General – Appendix A	The intent of the “Doped UO2 Fuel Pellets” column is unclear. Industry already has chromia and gadolinium doped pellets “approved” and in-service in US reactors. None of the comments can apply to fuel that has already been approved.	Clarify that this column is for pellets above 5%, for pellets expected to be used for higher burn-up, or both.

Attachment: Industry Comments to the Draft ATF Project Plan V1.2

17	General – Appendix A	<p>Table A.1 provides a priority (high, medium, low, TBD) for the various actions identified for closure by the NRC, and associated expected time frame (near-term, medium-term, long-term) which tends to be inverse of the priority (meaning higher priority actions generally tend to have a more near-term expected closure). Are there estimated durations or time frames associated with the closure of near-term, medium-term and long-term actions?</p>	<p>Provide estimated durations or timeframes associated with the closure of near-term, medium-term and long-term actions.</p>
18	Appendix A, Item #2 on “RG 1.183 - AST MHA/LOCA source term”	<p>Under Columns “Burnup to 68” and “Burnup to 75” it states “Reason: Fragmentation induced FGR of high burnup fuel may change MHA/LOCA source term and timing of release.” EPRI test results showed fragmentation does not significantly increase fission gas release. Fragmentation reduces non-gaseous fission product release into the coolant in a 24-hour soak in water.</p> <p>A series of fission product release experiments with local burnup up to 78 GWd/MTU were conducted. Specimens sealed in capsules at different pressures were heated to LOCA temperatures and fission product release was measured. At approximately 20 bars of pressure, fuel fragmentation can be effectively prevented, even for fuel significantly above the perceived fragmentation threshold. The test results showed fission gas release from fragmented fuel is only slightly higher relative to non-fragmented fuel of the same burnup but under higher pressure. Additional tests at even higher pressure, where fragmentation is suppressed in both cases, showed fission gas release can be further depressed and thus suggests fission gas release during a LOCA transient may be rod internal pressure dependent, i.e., less fission gas is released at higher rod internal pressure.</p> <p>Some of the test capsules, along with the fuel debris, were filled with water to evaluate non-gaseous fission product release. Test samples that severely fragmented released less non-gaseous nuclides into the water after a 24-hr soaking period. The lower</p>	<p>EPRI can provide NRC-RES access to EPRI Technical Reports and associated presentations through the existing MOU Addendum on ATF to increase understanding in this area. If desired by NRC and other stakeholders, the EPRI results may also be discussed with subject matter experts through the Fuel Performance and Testing Technical Experts Group (FPTTEG) of the Collaborative Research on Advanced Fuel Technologies for LWRs (CRAFT) framework.</p>

Attachment: Industry Comments to the Draft ATF Project Plan V1.2

		release rate may be related to lower wettability of smaller particles, a phenomenon well documented in literature.	
19	Appendix A, Item #3 on "RG 1.183" and "Non-LOCA steady-state and transient releases"	<p>Under Columns "Burnup to 75" and "Doped UO₂ Fuel Pellets" it states "Reason: Fragmentation-induced FGR of high burnup fuel pellet may change source term" and "Reactivity initiated accident (RIA) transient fission gas release is not currently well quantified."</p> <p>In the last 6 years, JAEA conducted several tests with fuel burnup up to 84 GWd/MTU (Ref.: Udagawa, Yutaka, 2018 JAEA Fuel Safety Research Meeting, Mito, Japan, October 30-31, 2018). There is a steady trend of increased release with burnup, but no sudden jump above the perceived fuel fragmentation threshold.</p>	If desired by NRC and other stakeholders, these JAEA results may be discussed by subject matter experts through the Fuel Performance and Testing Technical Experts Group (FPTTEG) of the Collaborative Research on Advanced Fuel Technologies for LWRs (CRAFT) framework.
20	Appendix A, Item #3 on "RG 1.183" and "Non-LOCA steady-state and transient releases"	<p>Under Column "235U Enrichment beyond 5.0 wt%" it states "Note: With respect to Table 4, extent of 235U enrichment in RIA empirical database unknown." This note questions the applicability to Table 4 but no action is identified.</p>	Clarify what, if any, actions are expected.
21	Appendix A, Item #5 on "RG 1.236"	<p>Under Column "Burnup to 75" it states "Reason: FFRD as result of HBU and possible loss of coolant geometry during RIA has not been well quantified or understood."</p> <p>It has not been established high burnup fuel would fragment in the same manner in an RIA versus in a LOCA. Fuel fragmentation has been reported in JAEA NSRR test of short pulse widths, but not clearly present in realistic longer pulse tests. The duration of the NSRR test does not allow enough time for gas to migrate out of the fuel while it is under compression. The short pulse also results in much higher temperatures in the outer radial locations of the fuel.</p> <p>Fuel fragmentation is known to be suppressed by compressive stress and once the gas is released the driving force for fragmentation may no longer exist.</p>	If desired by NRC and other stakeholders, these JAEA results may be discussed by subject matter experts through the Fuel Performance and Testing Technical Experts Group (FPTTEG) of the Collaborative Research on Advanced Fuel Technologies for LWRs (CRAFT) framework.

Attachment: Industry Comments to the Draft ATF Project Plan V1.2

22	Appendix A, Item #5	Item 5 in Table A.1 indicates that high burnup RIA data is needed with deposited energy beyond cladding damage. However, if operating conditions result in deposited energy less than cladding failure, then such data may not be required.	Revise language to indicate “may be” needed. Check for similarly used language within the Appendix.
23	Appendix A, Items #5 and #17.	Under “235U Enrichment beyond 5.0 wt%” it states that higher enrichment will yield higher rod worth and higher peaking. This is not necessarily true. Reactivity, not enrichment, should be the figure of merit. This is because higher enrichment will be balanced with higher burnable poison. It is thus entirely credible that a 6% enriched assembly could be less reactive than a 5% enriched assembly. The control rods, reactor power level, boron concentrations, and cycle energy requirements are not changing; thus, the assembly reactivities can’t be changing meaningfully. RIA (CRE and CRDA) analyses already specify rod worth limits.	This section and others similar in nature should be revised to replace “enrichment” with reactivity where merited.
24	Appendix A, Item #6 on “10 CFR 50.46”	Under Columns “Burnup to 68” and “Burnup to 75,” the Project Plan is based on a Draft (unapproved) regulation (50.46c). Since the proposed draft regulation could be approved prior to the implementation of higher burnup fuel, including the draft in the project plan is informative, however, there are no NRC actions identified that would bring this to closure consistent with the expected burnup implementation timeframe.	The information in this section should be based on and revised to meet the current regulatory requirements, not the draft rulemaking.
25	Appendix A, Item #6	Under “Doped UO2 Fuel Pellets,” it is unclear what an exemption is needed for. The industry has deployed doped pellets in operating reactors.	Provide clarification as needed.
26	Appendix A, Item #8 on “Standard Technical Specifications”	Under “235U Enrichment beyond 5.0 wt%” it states “TS 4.2.1 is fully applicable pending the outcome of the following: • NRC and TSTF to discuss whether or not the term “slightly” in TS 4.2.1 includes fuels enriched beyond 5%.” If industry is consistent with STS 4.2.1 and STS 4.2.1 is fully applicable to chrome-coated zirconium cladding and doped UO2 pellets it does not seem necessary to revise the Tech Spec.	Industry meeting the STS should be adequate and this should be reflected in the Project Plan.

Attachment: Industry Comments to the Draft ATF Project Plan V1.2

27	Appendix A, Items #11 on "10 CFR 50 Appendix K" & #19 on "NUREG-2121"	Under Columns "Burnup to 68" and "Burnup to 75," with regard to thermal conductivity degradation (TCD) in Item #11, closure is listed as "TBD" and is green color coded to indicate NRC has the action. When will this be determined? Is the NRC planning to expand on the cited Information Notice 2009-23?	Provide additional clarification.
28	Appendix A, Items #11 on "10 CFR 50 Appendix K"	<p>Closure bullet in Item #11 states indicates that industry has the action to determine the impact of fuel particle transport and deposition in terms of coolability and criticality. Previous tests quantified a wide range of fuel fragment/particle size (such as those done by Studsvik, Halden, ORNL, etc.) so clarification on what is meant by "fuel particle" would be helpful.</p> <p>Item #19 has this listed as only a Note but has industry action to close so should this be reworded to say "Closure" to be consistent with Item #11? There may be other instances of this throughout Appendix A so it is suggested that the NRC review for consistency.</p>	Clarification on what is meant by "fuel particle," review the wording for Item #19 to be consistent with #11, and review Appendix A for consistency.
29	Appendix A, Items #11 on "10 CFR 50 Appendix K" & #19 on "NUREG-2121"	Under Columns "Burnup to 68" and "Burnup to 75," a "Burnup Threshold" is used. While burnup is a key parameter in the determination of FFRD (namely fragmentation), other factors may be appropriate for an FFRD threshold. Numerous LOCA simulation tests have been performed, both in-pile and out-pile. While most of the tests show a burnup-threshold, some high burnup fuel did not fragment and thus other factors, such as pre-transient power and testing conditions, may be involved. EPRI test results showed fission gas release occurs with and without fuel fragmentation. Fission gas release is pressure dependent, with lower release while under pressure/before burst. It is not known if fission gas not released due to rod internal pressure would be released upon rod burst.	Replace "Burnup Threshold" with "Threshold."
30	Appendix A, Item #12, "10 CFR 51.21 Environmental Assessment (EA) vs	For the discussion of 10 CFR 51.21 environmental assessment versus 51.22 categorical exclusion, it is unclear if this would apply to a Part 50 (or 52) license holder versus a Part 72 license holder versus a fuel manufacturer/enricher. The second bullet for BU	Provide clarity.

Attachment: Industry Comments to the Draft ATF Project Plan V1.2

	51.22 Categorical Exclusion (CATEX)"	and enrichment only discusses performing an environmental assessment for transportation. It is unclear if an LAR (under 50.90) would require an EA based on Project Plan.	
31	Appendix A, Item #15	<p>Reactivity, not enrichment, should be the figure of merit. 50.68 even alludes to this. It says that keff must be less than 0.95; which makes sense. But it goes on to limit enrichment to 5%.</p> <p>With the potential need to increase enrichment levels for both existing commercial LWR reactors and advanced reactors, the appropriate action is to remove specific enrichment limits from 10 CFR 50.68. Retention of the necessary enrichment limits in the facility licensing bases, including Technical Specifications, provides adequate protection for criticality safety margins.</p>	The language should be revised to reflect the need to keep keff below 0.95, and let the licensee manage how to do that (enrichment, burnable poison, exposure, spacing, rack inserts etc). The facility specific enrichment limit is included in the facility license, so its inclusion in 50.68 is unnecessary.
32	Appendix A, Item #17 on "NUREG-0800 SRP Chapter 4.2"	Under "235U Enrichment beyond 5.0 wt%" it states "Note: Increased enrichment <u>will</u> promote higher rod worth and peaking factors and thus fuel enthalpy rise during RIAs."	Recommend changing "will" to "may." NRC should check for other prescriptive language in the document.
33	Appendix A, #19 on "NUREG-2121"	"Studsvick" is misspelled and should be "Studsvik"	Editorial correction.
34	Appendix A, Item #23 on "RG 1.240 and NEI 12-16 Rev. 4"	Under Column "235U Enrichment beyond 5.0 wt%" it states "Criticality codes must be validated with experiments that cover the applicable enrichment range." As itemized in Section 8.1.4.1 (page 33) of the Project Plan, there is more than one way to show that an experiment is applicable to a particular validation. However, the way it is written, this statement can be interpreted as "validation has to be done using critical experiments that cover the applicable enrichment range and therefore, new critical experiments are definitely needed."	<p>Recommend revising this sentence (and other similar items for RG 1.240 and NEI 12-16, Rev. 4 in the project plan) to be consistent with the listed potential approaches in Section 8.1.4.1 for this item. A recommended revision can be: "Criticality code validation needs to demonstrate that validation is applicable to the increased enrichment range (discussion in Section 8.1.4.1)".</p> <p>Also – please replace the word "must" with "may need to". Check the document for the use of other prescriptive language.</p>

Attachment: Industry Comments to the Draft ATF Project Plan V1.2

35	Appendix A, Items #23 on “RG 1.240 and NEI 12-16 Rev. 4” and #24 on “NUREG-0800 (SRP 9.1.1)”	Under Column “Doped UO2 Fuel Pellets” it states “ Note: Experiments for validation of criticality codes may be necessary. ” Similar to previous comments, the Project Plant should list the alternative approaches (e.g., sensitivity and uncertainty analysis as discussed in Section 8.1.4.1)	Recommend revising this sentence to be consistent with the listed potential approaches in Section 8.1.4.1 for this item.
36	Appendix A, Item #23 on “RG 1.240 and NEI 12-16 Rev. 4”	Under Column “Doped UO2 Fuel Pellets” it states “ Note: RG 1.240 Section C paragraph o states that for new fuel designs, justification for continued use of the assumptions presented in NEI 12-16 Rev 4 may be necessary. ” This note treats doped pellets as a “new fuel design;” existing work from ORNL (and perhaps others) shows that for SFP criticality, dopants are of minimal importance.	Recommend a note as in other places in green: Literature reviews and research will provide information on this technical issue.
37	Appendix A, Item #25 on “NUREG-0800 (SRP 9.1.2)”	Under “Doped UO2 Fuel Pellets” it states “ Note: Higher density fuel may lead to more 235U in the spent fuel pool; experiments for validation of criticality codes may be necessary. ”	Clarify if the two fragments (separated by semi-colon) are intended to be linked. The first part of the note is unnecessary and should be removed since criticality analyses must account for fuel density accurately or conservatively. For the Second part – see earlier comment on Items #23 and #24.
38	Appendix B	Appendix B notes the possibility of ACRS reviews of industry submittals.	NRC should address the steps that can be taken to avoid ACRS reviews delaying the approval of industry submittals, such as early coordination with ACRS and conducting reviews in parallel.
39	Appendix B	Figure B.1-1, blue box says “SRP 4.2 RIA testing.” The use of the term “testing” is too prescriptive. Suggest changing it.	Change “testing” to “evaluation.”