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General Comment

Per 53.620(d), I caution against using the terminology of "fresh fuel" for a reactor becoming fueled at the manufacturing facility prior to shipment. Factor Acceptance Testing would be expected to occur at the conclusion of manufacturing of a microreactor at the factory, creating byproduct material in the final reactor ready for shipment. This means that the package will be slightly radioactive with a need for shielding during transportation. Fresh fuel transportation doesn't need meaningful shielding. Therefore, it is recommended to abstain from the terminology "fresh fuel" in the Part 53 rule, as total applicability of Part 71 is cited in Part 53.