

NRCREP Resource

From: MOSESA@aol.com
Sent: Thursday, March 12, 2009 11:29 AM
To: NRCREP Resource
Cc: James Gaslevic
Subject: DG-1204 from today's Federal Register (74 FR 10784-10785)

COMMENT: After a quick look at DG-1204 (ML082960039 at http://adamswebsearch2.nrc.gov/idmws/doccontent.dll?library=PU_ADAMS^PBNTAD01&ID=090640241) and the several versions of NEI 08-01, which DG-1204 will endorse, on the NRC ADAMS web site, I find that this document does not clarify that it is applicable almost exclusively to Generation III ALWRs but not necessarily to Generation IV advanced non-LWRs which will likely not rely on demonstrated and well-qualified fuels that have been operated extensively in Generation II LWRs. No mention is made of the new fuel Testing, Inspection, and Surveillance Plans from Section 4.2 (Revision 3) of the SRP in NUREG-0800. There is no doubt that new fuel in a new Generation IV VHTR or SCR will have to undergo an extensive surveillance program under ITAAC, but this doesn't even get mentioned in DG-1204 that is clearly based on ITAAC only for ALWRs. This lack of clarification will only serve to foster naivete among the Generation IV proponents who seem to think that a few research reactor irradiation tests with fuel made under laboratory conditions will lead to full qualification of the advanced fuel.

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