

with the elements in multiphase systems at equilibrium" is erroneous: The UO_2 fuel was *not* in thermodynamic equilibrium during the accident at TMI-2!

Indeed, in that diffusional processes are considered to be key factors affecting fission product behavior (gaseous as well as volatile), the FASTGRASS diffusive flow model has been improved along the lines suggested by Matthews and Wood.¹⁰ A paper describing this model as well as other improvements (e.g., modeling intergranular bubble behavior with lenticular bubbles instead of spherical) and an extensive comparison of FASTGRASS predictions with experimental results will be available in the near future.

Fission product release from Three Mile Island Unit 2 (TMI-2) is estimated to be ~70% for the noble gases and ~50% for both iodine and cesium.¹¹ Figure 4 of Ref. 11 shows that FASTGRASS predicts that this magnitude of release is possible from low-burnup solid fuel under "TMI-2-type" heating conditions.

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COMMENTS ON "A COMPARISON OF GADOLINIA AND BORON FOR BURNABLE POISON APPLICATIONS IN PRESSURIZED WATER REACTORS"

The paper by Goldstein and Strasser¹ concerning the use of gadolinium in pressurized water reactors (PWRs) inexplicably omits three seminal references. The first² made the important observation that, for the 3 to 4 wt% Gd_2O_3 range, a one-for-one replacement of burnable ^{10}B elements by $\text{Gd}_2\text{O}_3/\text{UO}_2$ elements need not have major effects on power distributions and cycle lengths for first cycles.

The second³ analytically presented the effects of axial zoning of Gd_2O_3 in PWRs for the first time in the open literature and suggested generic techniques for power shaping by means of such axial zoning.

The third reference⁴ discussed the reduction of moderator coefficient in PWR first cycles by development of a unique hybrid (Gd_2O_3 and ^{10}B) design, the purpose being the solution of the anticipated-transient-without-scrum problem.

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