



PR 50 Draft Policy Statement
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Westinghouse

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OFFICE OF SECRETARY
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ADJUDICATIONS STAFF

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Subject: Westinghouse Electric Company Comments to Draft Policy Statement on Regulation of
Advanced Nuclear Power Plants

Westinghouse fully agrees with the NRC approach to the licensing of advanced reactors and concurs with its rationale. We welcome the emphasis on simplified safety systems and the reliance on designs focused on minimizing the potential for severe accidents. We believe that the recommendations expressed in this policy will not only improve the safety of advanced reactors but also reduce their cost. A simpler design will be safer and cheaper. While in the past increased safety was unfortunately accompanied by increased costs, Westinghouse believes that increased safety can be attained with lower costs through an appropriate advanced design. This has been the philosophy behind our advanced light water reactor design IRIS. Non-water reactors in our advanced reactors portfolio include the gas cooled PBMR and the sodium cooled 4S. Their safety relies on inherent features, which are optimized in 4S, and on providing by design very large margins to accident consequences in PBMR. Sodium reactors in particular have in the past been burdened by complex safety systems, in spite of their significant negative reactivity coefficients. Adherence to this policy proposed by NRC will help in reducing their current cost gap versus light water reactors.

We agree that Emergency Planning (EP) is part of the safety approach. We would like to add the consideration that the enhanced inherent safety and design features could allow a reduction in the EP requirements with attendant cost decreases.

We concur with the NRC linkage of safety and security early in the design stage, as we have actively promoted safety-by-design and security-by-design. Addressing these important issues simultaneously in the design stage will yield a safer, more secure and less expensive reactor plant.

As a reactor vendor with three advanced reactors in various stages of the preliminary licensing process, we are looking forward to working with the NRC according to the spirit of this policy statement.

Very truly yours,

J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing

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