Commissioner Svinicki's Comments on SECY-08-0019

I approve of the staff's efforts in preparing for possible advanced reactor applications as outlined in SECY-08-0019. Positioning this agency to be prepared to receive such applications is a daunting challenge for staff. This paper and its enclosure describe an impressive command of and involvement in current advanced reactor activities by NRC staff. This level of effort is even more impressive when contrasted with the meager budget that has historically, and somewhat unavoidably, been available for this work, given its speculative nature.

I support fully the organizational strategy outlined in the paper where the Office of New Reactors (NRO) is currently positioned as the lead for licensing of new reactors with the intention that the NRO corporate model for licensing new light water reactors can – and would – be adapted to certify advanced reactor designs and license them accordingly.

In general, I agree with the proposed resourcing and prioritization of activities as outlined by staff in SECY-08-0019. Specifically, I endorse the proposed advanced reactor prioritization scheme [SECY-08-0019 enclosure entitled, "Licensing and Regulatory Research Related to Advanced Nuclear Reactors"] which places the highest NRC staff priority on those advanced reactor activities which are either Congressionally-mandated and/or Commission-directed or where there is a confirmed domestic industry partner. That being said, I think it is also important to note that Chairman Klein recently received a letter from the Assistant Secretary for Nuclear Energy, U.S. Department of Energy [letter, D. Spurgeon to D. Klein, dated April 2, 2008] stating that "there is a fair degree of technical, programmatic, and regulatory risk in the Next Generation Nuclear Plant (NGNP) project." Consequently, the U.S. DOE is "pursuing a budget strategy that is aggressive but recognizes the uncertainties and provides a reasonable set of options.'

Realistically, I believe this statement about uncertainty could be expanded to the broader universe of advanced reactor plans and intentions beyond NGNP. Considering the breadth of advanced reactor activities described in the paper, and taking history as our guide, some measure of skepticism regarding plans and timetables is likely merited. Therefore, concluding with a somewhat unhelpful piece of advice, I encourage staff to remain nimble in its resourcing and planning for advanced reactor activities by keeping an eye on industry activities and adjusting pace accordingly.

5/5/08

A/3