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Pebble Bed Modular Reactor (Proprietary) Limited

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Date:
March 24, 2009

Your Ref.:

Our Ref.:
USDC20090324-1

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

NRC Project No. 732

Attention: Mr. William D. Reckley

Subject: Licensing Workloads for the Pebble Bed Modular Reactor

Ref: 1) Regulatory Issue Summary (RIS) 2009-03, "Process for Scheduling
Acceptance Reviews of New Reactor Licensing Applications After April
2009 and Process for Determining Budget Needs for Fiscal Year 2011,"
February 12, 2009

2) NRC Letter, Subject: Projecting Licensing Workloads for Advanced
Reactors in Fiscal Year 2011 and Beyond, February 24, 2009

The Pebble Bed Modular Reactor (Pty) Ltd. (PBMR) provides the following information in response to your requests to advanced reactor vendors to support NRC's resource planning efforts for FY 2011 and beyond (refs.). First, PBMR wishes to highlight our continuing efforts in preparation for eventual submittal of an application under 10 CFR Part 52 for a standard design certification. Second, in light of NRC's prior acknowledgement of limited resources for nearterm reviews of advanced reactor designs, PBMR recognizes that many of our planned activities for FY 2011 and beyond must be reviewed in conjunction with NRC's work activities that are planned and budgeted for DOE's Next Generation Nuclear Plant (NGNP) program. Many of the items that have been or will be submitted by PBMR are generic or partially generic to the NGNP program and are expected to be encompassed by the NGNP program work.

PBMR has submitted USDC white papers that form an essential element of developing a risk-informed licensing strategy, fuel design and qualification, high temperature materials, and Evaluation Model Development and Assessment Process (EMDAP). Additional papers on fuel performance and ceramics are planned. Other

papers may be developed on additional topics depending on the progress of the NGNP program and availability of NRC resources.

PBMR is an active participant in the NGNP program through its participation on the Westinghouse PBMR Team. In that regard, our planned paper for development of a detailed gas reactor application specification has been undertaken through the NGNP program. Additional pre-application topics have been identified through the NGNP program that are of keen interest to PBMR and that we will support.

PBMR intends to work with NRC and DOE to establish a sound regulatory framework for ensuring that reviews of a HTGR application can be undertaken in an efficient and effective fashion. PBMR is working within the program being advanced by DOE for the NGNP so long as it continues to support a reasonable commercialization schedule. In that regard, PBMR does not plan to submit a Design Certification application before 2013 unless progress on the NGNP program materially deviates from the current path.

If you have any questions about this matter, please feel free to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'E. Wallace', with a stylized, cursive script.

Edward G. Wallace
Senior General Manager- US Programs
PBMR (Pty) Ltd.

cc: Mr. Michael E. Mayfield, NRO
Mr. John R. Jolicoeur, RES
Mr. Stuart J. Rubin, RES
Mr. Wesley W. Held, NRO