

Rulemaking Comments

**From:** Gallagher, Carol  
**Sent:** Wednesday, July 01, 2009 4:01 PM  
**To:** Rulemaking Comments  
**Subject:** FW: Public Comment - Rulemaking Change for Small Reactor Licensing Fees  
**Attachments:** Coment from John Wheeler on Small Reaactor Licensing.pdf

**From:** John Wheeler [mailto:john.wheeler@yahoo.com]  
**Sent:** Tuesday, June 30, 2009 10:00 AM  
**To:** Gallagher, Carol  
**Subject:** Public Comment - Rulemaking Change for Small Reactor Licensing Fees

DOCKETED  
USNRC

July 1, 2009 (4:10pm)

NOTE: A PDF version of this letter is attached to this email.

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attention: Rulemakings and Adjudications Staff

**Subject: Comments on the Proposed Changes to Licensing Fees for Small Reactors**

To Whom It May Concern:

While the posted deadline has passed for comments to be assured consideration, I hope it will be practical for the commission to consider my input.

I graduated from the U.S. Merchant Marine Academy with a Bachelors Degree in Marine Engineering with a concentration in Nuclear Engineering. I have more than 20 years of experience operating nuclear reactors for the US Navy and in the commercial power industry. I was Engineering Office of the Watch and Plant Engineer qualified at the S3G nuclear prototype, and I have held Senior Reactor Operator Licenses at the Turkey Point and Indian Point nuclear plants. Having operated both small and large reactors, I can speak from personal experience that small reactors can be designed, built, and operated with equal certainty and safety as large power reactors. In fact, small reactors have many advantages over large reactors that can be used to increase safety margins if the designer so chooses. Examples include natural circulation, air-cooled decay heat removal, and enhanced security features. From my informed point of view there is no technical basis for concern that small reactors pose excessive risk to public health and safety.

The USA desperately needs new clean, cost-effective, carbon-free energy sources to power our economy and replace our aging energy infrastructure. Because of the extraordinarily high cost and intermittent operation, renewable sources can not accomplish this task alone. We need small nuclear reactors to provide industry and investors with a new lower cost, scalable option for adding nuclear generating capacity to our nation's power grid. In addition, small reactors could provide process heat in a number of applications in which large reactors are not practical. With that in mind, I support restructuring licensing fees to significantly reduce or eliminate the cost for small reactors for five reasons:

1. Licensing fees are so high that they are an impediment to investment and innovation.
2. The current fee structure is unfairly biased towards multi-billion dollar nuclear plants with huge power outputs.
3. The current fee structure is biased against nuclear energy in general. For example, designers and manufacturers of solar, wind, and renewable power plants are not required to pay such high licensing fees nor do they reimburse the government for costs associated with routine regulation and oversight.
4. Nuclear energy has become a critical part of our national economy and should receive equal treatment in our regulatory framework. Other industries such as the airline industry, the food industry, and the automobile industry are not subject to the same fees and are not required to reimburse the Federal Government for regulatory costs.
5. Small reactors can be built using factory-based modular construction techniques. Deploying of a fleet of small modular reactors would invigorate our nation's manufacturing industry and would provide thousands of jobs in regions of the nation that have been hardest hit by the recent economic events and the transfer of manufacturing jobs to other parts of the world. Our licensing framework should be revised to encourage investment in small reactors . Our licensing framework should be revised to encourage investment in small reactors and in doing so promote job growth.

Our nation has outgrown the reactor licensing framework of the past. It is time to level the playing field for nuclear energy. This requires us to rethink our entire reactor licensing and regulation fee structure. The fees associated with licensing small reactors are a great place to start! Thank you for the opportunity to comment on this important topic!

Sincerely,

John Wheeler  
Producer, "This Week in Nuclear" Podcast  
<http://www.ThisWeekinNuclear.com>

**John Wheeler**  
11040 Brentwood Avenue  
Zionsville, IN 46077  
(601) 707-8856

June 29, 2009

Nuclear Regulatory Commission  
Washington, DC 20555-0001

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John Wheeler  
Producer, "This Week in Nuclear" Podcast  
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Received: from HQCLSTR01.nrc.gov ([148.184.44.76]) by TWMS01.nrc.gov  
([148.184.200.145]) with mapi; Wed, 1 Jul 2009 16:00:56 -0400  
Content-Type: application/ms-tnef; name="winmail.dat"  
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From: "Gallagher, Carol" <Carol.Gallagher@nrc.gov>  
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>  
Date: Wed, 1 Jul 2009 16:00:55 -0400  
Subject: FW: Public Comment - Rulemaking Change for Small Reactor Licensing  
Fees  
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