RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER SVINICKI

SUBJECT: COMGEA-10-0001/COMGBJ-10-0004 – USE OF RISK INSIGHTS TO ENHANCE SAFETY FOCUS OF SMALL MODULAR REACTOR REVIEWS

Approved XX Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below ___ Attached XX None ___

SIGNATURE

08/9/10
DATE

Entered on "STARS" Yes ✓ No ___

Commissioner Svinicki's Comments on COMGEA-10-0001/COMGBJ-10-0004
Use of Risk Insights to Enhance Safety Focus of Small Modular Reactor Reviews

I approve COMGEA-10-0001/COMGBJ-10-0004 directing the staff to provide, for the Commission's review and approval, a paper describing its proposed approach for the development of a framework and strategy for using risk insights in the pre-application activities and eventual review of small, modular reactor (SMR) licensing applications. A discussion of how staff would propose to align (or de-conflict) NRC resources within the New Reactors area to support this development should be included in the paper. The paper should also provide a discussion on the timing and approach for seeking external stakeholders' views on this proposal. I also join Commissioner Ostendorff in his request that the staff paper address how the staff intends to develop resolution strategies for – and engage the Commission on -- the substantive policy considerations for SMR licensing laid forth in SECY-10-0034, "Potential Policy, Licensing, and Key Technical Issues for SMR Designs." Resolving some of these policy issues for SMRs would appear to be an essential precursor to the conduct of a truly risk-informed licensing process.

Kristine L. Svinicki 08/9/10

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER MAGWOOD

SUBJECT: COMGEA-10-0001/COMGBJ-10-0004 – USE OF RISK INSIGHTS TO ENHANCE SAFETY FOCUS OF SMALL MODULAR REACTOR REVIEWS

Approved _X___ Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below ___ Attached _X__ None ___

SIGNATURE

8-17-10
DATE

Entered on "STARS" Yes _X__ No ___

Commissioner Magwood's Comments
on
COMGEA-10-0001/COMGBJ-10-0004
USE OF RISK INSIGHTS TO ENHANCE SAFETY FOCUS OF
SMALL MODULAR REACTOR REVIEWS

I support COMGEA-10-0001/COMGBJ-10-0004. Given the rapidly expanding interest in small modular reactors and the Commission's policy encouraging the increased use of risk information in regulatory programs and processes it is both timely and appropriate to develop a regulatory framework that integrates the use of risk insights into the review process of small modular reactor license applications.

In a related paper, SECY-10-0034, POTENTIAL POLICY, LICENSING, AND KEY TECHNICAL ISSUES FOR SMALL MODULAR NUCLEAR REACTOR DESIGNS, staff identifies a number of policy, licensing, and key technical issues that may require Commission consideration to support license application review for small modular reactors. Those include:

- Accident source terms that would be used for the assessment of the effectiveness of the containment and plant mitigation features, site suitability, and emergency planning.
- Requirements for Operator Staffing for Small or Multi-Module Facilities
- Security and Safeguards Requirements for SMRs

I propose that staff provide the Commission options for the resolution for these key issues in the paper to be provided in response to COMGEA-10-0001/COMGBJ-10-0004.

To support and accelerate the development of this framework, consistent with my vote on COMGBJ-10-0003, FY 2012 Performance Budget Proposal, I am proposing that an additional 8FTE be allocated in 2012. These FTE should be applied to further the staff's work on SMRs and should be fully integrated with the ongoing activities associated with SECY–10–0034.

8/17/10

William D. Magwood, IV

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary

FROM: COMMISSIONER OSTENDORFF

SUBJECT: COMGEA-10-0001/COMGBJ-10-0004 – USE OF RISK INSIGHTS TO ENHANCE SAFETY FOCUS OF SMALL MODULAR REACTOR REVIEWS

Approved __X__ Disapproved _____ Abstain _____

Not Participating _____

COMMENTS: Below ___ Attached _X__ None ___

SIGNATURE

8/9/10
DATE

Entered on "STARS" Yes ___ No ___

Commissioner Ostendorff's Comments on COMGEA-10-0001/COMGBJ-10-0004
"Use of Risk Insights to Enhance Safety Focus of Small Modular Reactor Reviews"

I approve COMGEA-10-0001/COMGBJ-10-0004. I believe that a key obligation of the NRC is to ensure that the NRC's regulatory framework is clear, predictable, and efficient. As such, I believe that the plans and schedules to be included in the staff's paper should account for the existence of ongoing pre-licensing activities with small modular reactor (SMR) vendors who have already discussed their licensing strategies with the NRC staff. In developing this paper, the staff should seek input from SMR vendors and other relevant external stakeholders.

I view the risk-informed proposal of my colleagues as complementary to and supportive of the staff's efforts to address critical policy and technical issues for SMR licensing described in SECY-10-0034, Potential Policy, Licensing, and Key Technical Issues for SMR Designs. Based on SECY-10-0034, my discussions with the NRC staff, and interactions with SMR vendors, I believe that issues such as security, emergency planning zones, and control room staffing, are critical substantive policy considerations of concern to potential SMR applicants that should be addressed in the near term.