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General Comment

NRC,

Your organization has an admirable dedication to safety, which is evident in the practically flawless operational history of civilian nuclear power plants in the United States. Unfortunately these exacting safety standards are not applied as rigorously in competing energy industries; I don't think that view is controversial. I'm concerned that continued singular focus on safety of the nuclear industry unintuitively leads to worse safety and economic competitiveness of the overall energy industry, as dirtier and less safe energy sources beat nuclear operators to market. All Americans would benefit from an energy mix that had a much higher proportion of

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power produced by fission, but that general interest is all too easily defeated by special interests which are less easily demonized.

The NRC's predecessor, the AEC, had a dual mission to promote nuclear safety and to promote the use of nuclear power. I believe Americans would be better served if the NRC specifically sought to preserve American competitiveness and leadership in civilian nuclear power. The Canadian Nuclear Safety Commission is a good model; the main feature Canada gets right, in my opinion, is emphasis on performance based licensing criteria that strives to be technology neutral. The current NRC framework makes licensing costs and timelines extremely uncertain for any reactor design outside of traditional light water reactors. The NRC should preemptively adopt a framework to handle all of the designs approved by the Generation IV forum as worthy of further development: the Molten Salt Reactor; the Lead-Cooled Fast Reactor; the Sodium-Cooled Fast Reactor; the Gas-Cooled Fast Reactor; the Very High Temperature Reactor; and the Supercritical Water-Cooled Reactor. Providing an expedited framework for demonstration plants using these designs would fundamentally improve the safety and competitiveness of the US nuclear industry. No amount of careful regulation can bring a Generation II PWR up to passive safety standards, or reduce the quantity of spent nuclear fuel produced.

The last point I want to emphasize is the importance of a closed nuclear fuel cycle. Political difficulties have made permanent geological repositories for spent nuclear fuel a non-starter. In the interim SNF continues to pile up at aging reactors, requiring ongoing maintenance and control. The NRC should emphasize reactor designs that improve the logistics profile of SNF and/or fuel reprocessing. I would also note that several molten salt reactor designs do not require any fuel reprocessing and can be used to close the fuel cycle of the existing nuclear fleet.

Sincerely,
Casey Thormahlen