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Variable Annual Fee Structure for Small Modular Reactors

Comment On: NRC-2008-0664-0018
Variable Annual Fee Structure for Small Modular Reactors

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General Comment

I am writing to support the NRC's proposed new rule on SMR license fees, rulemaking (RIN 3150-AI54) and Docket ID NRC-2008-0664), where "the NRC proposes to implement a variable annual fee structure for SMR licensees that would include a minimum fee, a variable fee, and a maximum fee based on an SMR site's cumulative licensed thermal power rating."

The proposed use of cumulative licensed thermal power rating provides the most appropriate basis for establishing the fee, because the rate of production of fission products, which create the most important hazard associated with fission power, is directly proportional to cumulative reactor thermal power, and thus to the total source term that might be mobilized in a reactor accident. SMRs provide higher intrinsic safety, because this source term is divided into smaller quantities, reducing the maximum release possible if an accident occurs in a reactor unit. SMRs designs also can be expected to make more extensive use of intrinsic feedback and passive safety features, significantly reducing the complexity and inspection requirements for reactor safety systems compared to existing large light water reactors. For these reasons the proposed rule provides a simple, and appropriate approach to assess license fees.