

# PUBLIC SUBMISSION

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**Docket:** NRC-2016-0146  
NRC Vision and Strategy for Non-Light Water Reactor Mission Readiness

**Comment On:** NRC-2016-0146-0001  
NRC Vision and Strategy for Non-Light Water Reactor Mission Readiness

**Document:** NRC-2016-0146-DRAFT-0002  
Comment on FR Doc # 2016-17327

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## Submitter Information

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## General Comment

See attached file(s).

## Attachments

2016-09-19 - INL Team Comments on NRC Strategy Doc

SUNSI Review Complete  
 Template = ADM - 013  
 E-RIDS= ADM-03  
 Add= *J. Taylor (EAT 1)*

No.	Topics	Section	Comment
1.	NRC Engagement	General	In general, we appreciate NRC efforts to further define its vision and strategy for non-LWRs. We look forward to opportunities for near term engagement as NRC further refines the list of priority issues, and the associated Implementation Action Plans (IAPs) efforts and timelines that are established to address them, so that DOE and industry can provide support and input where needed.
2.	Solicit Industry Input	General	The NRC should solicit industry input to be included as a key enabler to future NRC detailed planning with specific "checkpoints" along the way to verify processes are on-track and address the entire non-LWR community. DOE should also be a component in the "stop-and-check" framework development.
3.	Collaborate With DOE	General	The NRC effort be done in a cooperative fashion with DOE. This makes sense since DOE has the expertise in the advanced reactor technologies. This would be the most efficient way to develop the new framework and having two government agencies working together provides efficiencies.
4.	Add Fuel Fab/Spent Fuel Storage Framework	General	Does the NRC strategy also include developing a framework for Fuel fabrication facilities and spent fuel storage, since these are needed along with the reactors?
5.	Include Financial Readiness Discussion	General	Financial resources to create readiness are not discussed. Phase 2 will require significant dollars – the vision and strategy document should discuss the strategies and options for obtaining needed funding.
6.	Update Non-LWR Technical Readiness	3.3	In its "Report to Congress on Advanced Reactors" (August 2012), NRC provided its summary (see Section 2.3) view of the relative levels of non-LWR technology readiness. Can NRC provide an update to this summary discussion, based on the additional information it has received and reviewed in the past four years?
7.	Improve Technical Readiness	4.4	Page 15, second bullet in the first set of bullets: It's clear that establishing an inventory of staff non-LWR technical skills would include training of the staff in the specifics of various non-LWR technologies. It would be useful if this bullet is expanded with specifics regarding how the staff will acquire these skills.
8.	Communication	3.2	The second sentence of this section indicates that NRC has provided specific guidance to potential applicants to assist in preparing non-LWR applications. Can the NRC provide a couple of examples that have been developed to supplement the more high level discussions that are typical of the discussions in the NRC/DOE workshops?
9.	Policy Issue Resolution Schedule	4.4	It's not clear why "identify and resolve technology-neutral policy issues" is reflected as both a near term (0-5 years) and a mid-term (5-10 years) strategy.
10.	Clarify "Technology Neutral" Terminology	4.4	It is suggested that NRC clarify what it means by the term "technology neutral." Does NRC intend that issues with this label would need to be resolved in a manner that addresses the LWR operating fleet, the LWR-based SMRs, and non-LWRs, or is it intended to apply only to non-LWRs?