

ClinchRiverESPEISCEm Resource

From: Kara Colton <Kara.Colton@energyca.org>
Sent: Monday, June 12, 2017 3:07 PM
To: ClinchRiverESPEIS
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Subject: [External_Sender] Energy Communities Alliance's Comments for Submission on Docket ID NRC-2016-0119
Attachments: Final ECA Comments on Docket ID NRC-2016-0119.pdf

Please find attached comments from the Energy Communities Alliance (ECA) on the Nuclear Regulatory Commission's notice of review of TVA's Early Site Permit at the Clinch River Site in Tennessee. ECA appreciates NRC's outreach efforts to ensure affected stakeholders at the local level have an opportunity to provide input. If you have any questions, please contact Kara Colton, ECA's Director of Nuclear Energy Programs, at 703-864-3520, or by email at kara.colton@energyca.org; or Seth Kirshenberg, ECA's Executive Director, at 202-828-2317, or by email at sethk@energyca.org.

Sincerely,
Kara



Kara S. Colton

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**COMMENTS
ON BEHALF OF ENERGY COMMUNITIES ALLIANCE**

**SUBMITTED TO THE
U.S. NUCLEAR REGULATORY COMMISSION
ON**

DOCKET No. 52-047; NRC-2016-0119

**TENNESSEE VALLEY AUTHORITY;
CLINCH RIVER NUCLEAR SITE;
EARLY SITE PERMIT APPLICATION**

JUNE 12, 2017

Submitter's Name/Affiliation: Energy Communities Alliance
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COMMENTS ON TENNESSEE VALLEY AUTHORITY; CLINCH RIVER NUCLEAR
SITE; EARLY SITE PERMIT

The Energy Communities Alliance (ECA) appreciates the opportunity to provide comment on the U.S. Nuclear Regulatory Commission's (NRC) Docket ID NRC-2016-0119 regarding the application from the Tennessee Valley Authority (TVA), for an early site permit (ESP) for the Clinch River Nuclear (CRN) Site.

ECA is the only national organization of local, elected and appointed officials of communities adjacent to U.S. Department of Energy (DOE) federal facilities. Our members have long played a key role supporting the country's national security efforts, and many are now exploring how best to leveraging existing assets (i.e., land, energy facilities, nuclear expertise and a skilled workforce) to support the development of new energy production facilities and advanced energy technologies.

ECA believes that by undertaking the review of TVA's early site permit, the NRC is taking a critical and important first step forward towards realizing the development and construction of advanced nuclear production technologies which will increase U.S. energy independence, improve reliability, reduce carbon emissions, and create economic opportunities and well-paid clean energy jobs in our communities.

In 2014, ECA formally adopted a policy position¹ supporting the development of new nuclear power generation facilities, such as a small modular reactor (SMR) at the Clinch River Nuclear Site. Since that time, ECA has been working with DOE and industry to understand their priorities and ensure there is a robust, local workforce with the capabilities necessary to support new nuclear missions. We are also considering the role for local governments in hosting manufacturing industries associated with advanced nuclear technologies, and public-private partnership opportunities for financing and power purchase agreements.

¹ See: [Energy Communities Alliance Policy Book](#): Nuclear Energy and Waste Management Policy, p.13.

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Individually, several ECA members are already taking steps to support SMR and advanced nuclear technology development. In 2012, the County Commission in Roane County, TN – the community that hosts TVA's Clinch River Site – unanimously passed a resolution² supporting TVA in its SMR application. The neighboring City of Oak Ridge, Tennessee, also recently passed a resolution in favor of moving forward with NRC's review of TVA's early site permit for an SMR on the Clinch River Site. Los Alamos County, New Mexico, and the City of Idaho Falls, Idaho, both part of Utah Associated Municipal Power Systems (UAMPS), are engaged with NuScale and efforts to build an SMR on DOE's Idaho National Laboratory reservation near Idaho Falls. The communities around the Hanford Site in Washington State are similarly interested, with a 2014 study completed by the Tri-City Development Council concluding, "siting an SMR generating station at Hanford is technically feasible and many benefits come from using the existing infrastructure, local nuclear workforce, and other regional assets."³

ECA supports the NRC proceeding with preparation of the environmental impact statement and conducting the scoping process. We believe this effort can help create a model for siting new advanced nuclear facilities and lead to better understanding of how the federal government, local governments, regulators and industry can work together to help these projects come to fruition.

² See: Roane County Resolution #05-12-24

³ See: "[Small Modular Reactor Hanford Site Analysis Final Report](#)," *Tri-City Development Council*, December 2014.