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Emergency Preparedness Requirements for Small Modular Reactors

Comment On: NRC-2015-0225-0002

Emergency Preparedness for Small Modular Reactors and Other New Technologies: Draft Regulatory Basis for Comment

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Submitter Information

Name: John Snyder

Address:

3360 Creekside Dr
Idaho Falls, ID, 83404

General Comment

I urge NRC to pursue and implement emergency zone planning regulations that would be consequence-oriented, performance-based, and technology inclusive to the extent possible, and continue to provide reasonable assurance of adequate protection of public health and safety.

I have read the Draft Regulatory Basis (ML16309A332), and am comfortable with the proposed rulemaking.

I support the performance-based approach to emergency planning, specifically that means:

Implementing procedures, facilities, organization, training, activation processes, duty roster qualifications, shift staffing, response organizations, communication systems, facility location, and emergency requirements that are part of the licensee's responsibility to be demonstrated by setting up appropriate performance indicators;

Defining an appropriate corrective action process for identified weaknesses and their correction consistent with the significance of the weaknesses;

Demonstrating EP performance in terms of protecting public health and safety at a level comparable to or higher than that required for currently operating large LWR facilities; and

Establishing an NRC oversight process that can ensure that a high level of EP exists and that it provides for

reasonable assurance that public health and safety is protected.

I support the technology inclusive approach to emergency planning, specifically the elimination of the need for lengthy, costly exemption requests and responses.

I support rulemaking that will:

Promote regulatory stability, predictability, and clarity;

Recognize technological advancements embedded in design features;

Credit small reactor core size and associated differences in accidents; and

Eliminate the current regulatory need to request exemptions from EP requirements.