

From: [Jan Rogers](#)
To: [RulemakingComments.Resource](#)
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Subject: [External_Sender] Docket ID NRC-2015-0225 - Emergency Preparedness for Small Modular Reactors and Other New Technologies
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It is *very appropriate* for The U.S. Nuclear Regulatory Commission (NRC) to *advance consideration* of making a ruling change that would develop new emergency preparedness (EP) requirements for small modular reactors (SMRs) and other new technologies (ONTs), such as non-light-water reactors (non-LWRs) and medical isotope production facilities. The EP regulations on these new and advanced technologies *are essential* as they are not reflective of the current technology and fleet. Any regulatory change should maintain EP 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 in the event of a nuclear accident.

The advancements in SMR technology such as NuScale which has met many regulatory milestones and is currently being reviewed by the NRC are reflective of designs that require a much smaller footprint than current technology. If no changes are made to the current EP, it assumes that the new technology and smaller footprint of the SMRs will have the same impact as the older, larger current fleet.

I hope that the NRC will *strongly consider* making a rule change for SMRs and ONTs that reflect the new designs and performance and not continue under the current rule.

Thank you for your time and consideration.

Sincerely,

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