NuScale Power

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June 29, 2017

Docket: 52-048

The Honorable Kristine L. Svinicki
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUBJECT: NuScale Power, LLC Comments on Small Modular Reactors (SMR) and Other New Technologies (ONT) Emergency Preparedness Proposed Rulemaking Draft Regulatory Basis Document

REFERENCES:
1. Draft Regulatory Basis Document for Proposed Rulemaking, "Emergency Preparedness for Small Modular Reactors and Other New Technologies," (FRN Docket No. NRC-2015-0225)
2. Letter to Michael Mayfield (USNRC) from Michael Tschilitz (NEI), "NEO Comments on the Draft Regulatory Basis for *Rulemaking for Emergency preparedness for Small Modular Reactors and Other New Technologies,* June 26, 2017.

On April 13, 2017, the Nuclear Regulatory Commission (NRC) issued a draft regulatory basis document for proposed rulemaking for, Emergency Preparedness for Small Modular Reactors and Other New Technologies (Reference 1). NuScale Power, LLC (NuScale) appreciates the NRC's prompt action on this issue, as achieving a site boundary emergency planning zone (EPZ) is critical to NuScale's success.

NuScale fully supports industry's comments provided in Reference 2. Emergency preparedness regulations developed in recognition of the enhanced safety of small modular reactors (SMRs) and the unique characteristics of other new technologies are important to the development and deployment of these new technologies.

Regulatory certainty for EPZ size is a significant factor in the procurement decision-making process of potential customers for the NuScale SMR. NuScale expects to be able to demonstrate a site boundary EPZ for our design using a risk-informed performance-based approach as described in Reference 1. The strategic importance of a site boundary EPZ for the NuScale SMR design includes the following:

1. Putting an appropriate perspective of the public health and safety risks of the NuScale SMR in comparison to nonnuclear facilities under the auspices of an all-hazards plan.
2. Reducing operating and maintenance costs significantly (quantified in Reference 1), thereby improving the economic basis for selection by potential customers.
3. Allowing deployment at a larger number of sites including brownfield retired coal power plants and military bases.
4. Bolstering NuScale's international prospects as a result of approval under the NRC's known rigorous safety standards.
5. Enhancing the influence of the United States to promote nuclear nonproliferation policies through international deployment of NuScale SMRs.

Sincerely,

John L. Hopkins
Chairman and Chief Executive Officer

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