PR-50, 52
82FR17768

55

PUBLIC SUBMISSION

As of: 7/6/17 2:56 PM
Received: June 27, 2017
Status: Pending_Post
Tracking No. 1k1-8x7b-jg2i
Comments Due: June 27, 2017
Submission Type: Web

Docket: NRC-2015-0225
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

Document: NRC-2015-0225-DRAFT-0042
Comment on FR Doc # 2017-07502

Submitter Information

Name: Jackie Flowers
Address: United States,
Email: jackieflowers@cableone.net

General Comment

June 27, 2017

ATTN: Rulemakings and Adjudications Staff
US Nuclear Regulatory Commission
Washington DC 20555-001
Submitted via Regulations.gov

Re: Comments on Draft Regulatory Basis Document for Rulemaking for Emergency Preparedness for Small Modular Reactors and Other New Technologies (Rulemaking Docket No. NRC-2015-0225)

Thank you for the opportunity to comment on the Draft Regulatory Basis Document for Rulemaking for Emergency Preparedness for Small Modular Reactors and Other New Technologies. As someone who lives in Idaho Falls and works in the energy industry, I appreciate the role of the Nuclear Regulatory Commission (NRC). Particularly the roll of evaluating advancements in technology related to nuclear power plants while ensuring relevant safety standards are in place for both public and environmental safety.

As we see long awaited advancement in nuclear technology including development of next generation reactors (such as Small Modular Reactors (SMR)), it is important that we use our historic experience to guide our processes but that historic perspective should not be the limiting factor. Next generation reactors have design features that vary from traditional reactor technology. It is imperative that the analysis be relevant to

the proposed designs using risk-informed considerations. The Nuclear Energy Institute has worked to develop a path forward for modernizing the NRCs Emergency Preparedness (EP) framework (Whitepaper: "Proposed Emergency Preparedness Regulations and Guidance for Small Modular Reactor Facilities", July 16, 2015). The risk-informed analysis should govern decisions on matters like the Emergency Planning Zone. I appreciate the NRC being open to these discussions and look forward to the advancement of the regulatory process to better align with the evolving technology design.

Many of these new reactor designs incorporate inherent safety features, for example, the NuScale design is based on below-ground siting and passive cooling capabilities. Development of next generation reactors should lead to improvements in technology that mitigate risk where possible. Simultaneous to the technology advancements, we need advances in rulemaking. The rules must accurately address the proposed design and be based on a meaningful risk profile. The final EP rule should make clear that the NRC will only review accident scenarios that have a meaningful risk profile including probabilistic risk analysis where possible.

I appreciate the NRC's efforts to advance initiatives that improve the licensing process for next generation reactors, ensuring the rules are relevant to the proposed design. Thank you for the opportunity to comment.

Sincerely,

Jackie Flowers
Idaho Falls, Idaho