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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

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General Comment

Dear NRC,

My name is Pavel Velkovsky. I am a student at UC Berkeley, affiliated with the Nuclear Science and Security Consortium, and I support using the site boundary as the emergency planning zone for small modular reactors.

Even in the worst case scenario for a light water reactor (Fukushima), a large emergency planning zone might cause more harm than good. According to the WHO, there have been "no acute radiation injuries or deaths among the workers or the public due to exposure to radiation resulting from the (Fukushima) accident". Yet the stress from the process of evacuation has indirectly lead to about 1,600 deaths, mostly from the movement intensive care patients away from adequate medical facilities.

With Small Modular Reactors' more passive safety features and smaller footprint, it makes sense to have a smaller evacuation zone than with traditional light water reactors. Since NuScale's reactors are meant to replace old, dirty coal power plants, it would also be better for human health and the environment if the planned builds go as smoothly as possible. The deaths from "business as usual" air pollution far outweigh the deaths from even the worst nuclear accidents.

I appreciate the NRC's independence from industry, and its commitment to keeping nuclear power plants safe.

But I believe that regulations should reflect the improvements in safety inherent to NuScale's design.

Sincerely,
Pavel Velkovsky