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# PUBLIC SUBMISSION

**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

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## General Comment

The size and design of Emergency Planning Zones for reactors is a form of risk management, not risk prevention, and as such the EPZs were never meant to completely remove the possibility of exposure to the populace, but to provide ample response time to a possible accident scenario and mitigate the effects of the scenario to a certain point. The original designations of the distances for Emergency Planning Zones were based on technical information concerning the design, fuel type and quantity, and coolant type from the most common plant designs in the United States. Small Modular Reactors bear significant differences from the plants this rule was developed for.

As such, I believe the regulations regarding EPZs for SMRs, ONTs, and non-LWRs should be reevaluated using the same technical knowledge and mechanisms applied to the original EPZ evaluation for the larger plants but with the characteristics of these plants used instead. Whether or not this process will result in larger or smaller EPZs for these new plants I cannot say, but the regulation would at least be a fair one: applying no undue burden on the new plant designs while maintaining the same safety considerations and logic as those for larger plants.

While I understand research and test reactors are not under the purview of this proposed rule, I would like to emphasize that test and research reactors have different rules governing their EPZs because of a number of factors including the fact that they operate at different power levels using different fuel types from traditional LWRs. I would again support, based on this consideration, that SMRs, ONTs, and non-LWRs have their EP requirements reevaluated.