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Emergency Preparedness Requirements for Small Modular Reactors and Other New Technologies

Comment On: NRC-2015-0225-0071

Emergency Preparedness for Small Modular Reactors and Other New Technologies; Proposed Rule

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General Comment

Emergency preparedness is certainly important, but the plan must scale to the risk. The human health and safety risk posed by any reasonable measure will scale down significantly from large light water reactors. The mechanism for dispersal of nuclides is significantly reduced in its energy and ability to affect a large area. Not only should we expect any unwanted event to be smaller and thus have a much smaller footprint, we should not burden the operation of these smaller reactors with a preparedness plan designed for a larger event. That would be a cost burden with no benefit to anyone.

I ask that you give reasonable study to modeling failure and sizing the emergency preparedness plan appropriately.

Thank you for your consideration.