

From: Mike Ruby <myvoice@oneclickpolitics.com>
Sent: Tuesday, June 30, 2020 5:34 PM
To: AdvancedReactors-GEIS Resource
Subject: [External_Sender] Small scale advanced nuclear power deserves a GEIS, Docket ID: NRC-2020-0101

Re: Small scale advanced nuclear power deserves a GEIS, Docket ID: NRC-2020-0101

Dear Nuclear Regulatory Commission,

I am writing in support of the U.S. Nuclear Regulatory Commission's proposal to produce a generic environmental impact statement (GEIS) for small-scale advanced nuclear reactors.

Although each type of small-scale reactor is different It would certainly be reasonable to assume that a generic statement could be prepared that would cover more than 80% of the possible environmental impacts. Evaluating the remaining impacts, it would be possible to identify what is different about each proposal and quickly prepare a new EIS for each different type of proposed reactor.

This approach would address the NRC's primary mission to protect the public health and safety, by ensuring that clean, emission-free power plants can be effectively evaluated and brought online. There are several reasons supporting this effort, including:

- 1) NRC has decades of experience evaluating and overseeing small scale and advanced nuclear reactors (ANRs) so it can certainly preppare such a generic document that will cover the likely impacts.
- 2) The category of advanced reactors covers a far wider variety of potential reactor designs than exist today so it will be necessary to review each new design type, but they will all share some fundamental characteristics, such as, lower material use, reduced water demand, and more inherent safety characteristics.
- 3) There is significant basis for assuming small-scale ANRs would be much less likely to cause significant offsite radiation releases.
- 4) Similarly, non-light water reactor microreactors contemplated in the GEIS would, by definition, have a dramatically smaller environmental footprint than large light water reactor plants traditionally evaluated in large plant EIS analysis, and these non-LWR microreactors lend themselves to a generic evaluation.
- 5) Advanced reactors that utilize a fast spectrum are an effective tool to reduce radioactive waste so this part of the evaluation is much simpler.
- 6) All of the environmental impacts of small-scale ANRs will have significantly positive environmental justice impacts, especially due to their fundamental ability to have more

distributed and smaller footprints, as well as the ability to reduce cost overruns, and for communities to "opt-in" as opposed to having large plants of any kind which are generally forced on small, underprivileged, or remote communities.

The NRC must consider the importance of streamlining the environmental review and licensing process for ANRs due to the realities of climate change, since nuclear power still provides a majority of U.S. emission-free power, and represents the best option for scaling up clean electricity to meeting emissions targets before broader environmental collapse and further impacts on health due to emissions.

Thank you for continuing to ensure health and safety, in particular by enabling efficient review of clean power plants.

Sincerely,
Mike Ruby
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