

From: Nicholas Handler <myvoice@oneclickpolitics.com>
Sent: Tuesday, June 30, 2020 5:47 PM
To: AdvancedReactors-GEIS Resource
Subject: [External_Sender] Please approve a Generic Environmental Impact Statement, Docket ID: NRC-2020-0101

Re: Please approve a Generic Environmental Impact Statement, Docket ID: NRC-2020-0101

Dear Nuclear Regulatory Commission,

I would like to voice my unequivocal support for the U.S. Nuclear Regulatory Commission's proposal to produce a generic environmental impact statement (GEIS) for small-scale advanced nuclear reactors.

The NRC already has many decades of experience overseeing and evaluating small-scale reactors, many of them featuring advanced (non-LWR) designs. So we already know a lot about them. We know that their material requirements are much lower than for traditional LWRs. We know that their spatial footprints are dramatically smaller than for a typical LWR. We know that they do not (unlike many LWRs) abstract large quantities of water from local watersheds. We know that they all feature inherent safety features that make it physically impossible for them to melt down. And we know that, due to the quantity and type of fuel they use, many of them simply cannot release a significant quantity of radioactive material into the environment, even in the extraordinarily unlikely event of a major accident. These aspects of small-scale advanced nuclear reactors have all been extensively studied and are well supported in the academic literature.

For all of these reasons, the potential environmental impacts of small-scale advanced nuclear reactors are not directly comparable to those of large-scale LWRs (the technology for which the current EIS procedure was designed). I fail to see how it would benefit public health and safety in the United States to regulate one as though it were the other. The technology is different. The fuel is different. The size is different. And the construction method is different: every small-scale and advanced reactor design I've seen is meant to be factory-constructed and highly standardized, which suggests we can and should make the environmental review process much simpler and more streamlined.

I would even suggest that using the older and clearly inappropriate EIS procedure to complicate the construction of small-scale advanced nuclear reactors is a strategy that itself carries considerable risks to public health and safety:

(1) Firstly, we are in a global climate crisis: protecting the public health and safety of Americans in the current era will therefore require us to greatly expand the capacity of our nuclear fleet. Delaying or obstructing this expansion through poor regulatory design is something that will cost American lives and livelihoods.

(2) Secondly, fast-spectrum advanced reactors are a crucial tool for closing the nuclear fuel cycle and reducing the quantity of radioactive waste we produce. Public concerns about spent nuclear fuel are well known, and will only become more relevant as the nuclear sector expands: using a GEIS will help address those concerns by facilitating the construction of fast reactors.

(3) Thirdly, many remote, off-grid communities also require electric power to ensure basic public health and safety. Without small-scale and advanced nuclear reactors, these communities are essentially reliant on diesel generators, whose continuous use has significant and well-known effects on human health and atmospheric carbon concentrations.

(4) Fourthly, and finally, in the near future advanced reactors will almost certainly provide the baseload electricity that is currently being generated (in many areas) via the combustion of coal or natural gas. We need to get rid of those coal and gas plants, since they produce significant negative health effects on all those who live near them. Making it more difficult to build small-scale advanced nuclear reactors is only going to prolong and worsen the health effects of coal combustion.

It is my sincere hope that NRC will make a decision that is honest, moral, and grounded in technical and scientific facts: please produce a generic environmental impact statement for small-scale advanced nuclear reactors. I further hope that NRC keeps technical and scientific facts in mind (along with its mission to protect public health and safety) as it receives potentially negative feedback from other citizens.

Thank you for all of your hard work, and for providing this opportunity for public input.

Sincerely,
Nicholas Handler
maxhandler@gmail.com
4610 42nd Ave S Seattle, WA 98118 Constituent

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