

From: Sherrill Futrell <safutrell@ucdavis.edu>
Sent: Tuesday, June 30, 2020 6:13 PM
To: AdvancedReactors-GEIS Resource
Subject: [External_Sender] Docket IDNRC-2020-0101: No Generic Review for Unknown, Untested Nuclear Reactors

Nuclear Regulatory Commission

RE: Docket IDNRC-2020-0101: No Generic Review for Unknown, Untested Nuclear Reactors

Dear ,

Dear Kenneth T. Erwin:

I OPPOSE the U.S. Nuclear Regulatory Commission's proposal to produce a "generic" environmental impact statement (GEIS) for "small-scale advanced nuclear reactors." NRC has no experience regulating "advanced" nuclear reactors (ANRs). There have been no commercial "non-light-water reactors" in operation in the US since the 1980s. In fact, only three were ever built, and all were licensed before the NRC was created in 1975.

Creating a generic environmental review is an exercise in speculative fiction. There is no such thing as a "generic" ANR. In fact, the whole category of "advanced reactors" covers a far wider variety of potential reactor designs than exist today. There are potentially dozens of different combinations of fuel sources, fuel designs, moderators, and coolants. Each type of ANR would have different possible safety issues and possible ways to release radiation. They would also rely on wholly different fuel cycles, with a variety of environmental impacts.

Accidents with "small-scale" ANRs CERTAINLY COULD cause significant offsite radiation releases. History shows there is no such thing as an accident-proof nuclear reactor.

There is no basis for determining that the "microreactors" contemplated in the GEIS would have a "small environmental footprint" or that there would be no offsite radiation releases in the case of an accident.

Non-light water reactors have been known to have significant safety risks for decades.

Advanced reactors would generate many different kinds and forms of radioactive waste that would be even more difficult to manage than produced by the current light-water reactors.

I don't think you all know what you're doing. So stop.

Thank you.

Sincerely,
Sherrill Futrell

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Federal Register Notice: 85FR24040
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