

From: Traber Schroeder <traber.schroeder@gmail.com>
Sent: Tuesday, June 30, 2020 11:15 PM
To: AdvancedReactors-GEIS Resource
Subject: [External_Sender] Oklo Generic Environmental Impact Statement

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. Innovation in this field must not be guided by outdated fear of nuclear, or influenced by anti-nuclear NGOs that seek to use the position of the NRC to stifle the progress of clean energy. This action directly supports 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).
- 2) While the category of advanced reactors covers a far wider variety of potential reactor designs than exist today, fundamentally, lower material, the lack of use of incredible amounts of natural watersheds, and more inherent safety characteristics means lower overall impact and significant topic areas which may be ruled on in a generic fashion for these technology types.
- 3) There is significant basis for assuming small-scale ANRs would not be able to cause significant offsite radiation releases. The U.S. has had experience with literally hundreds of small-scale reactors without a single significant release.
- 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 the only effective tool in the world to both produce clean electricity as well as reduce radioactive waste. In fact, they are key to closing the fuel cycle and turning current hazards into valuable assets to the public.
- 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. Dirty, polluting power plants and activities have been located disproportionately on indigenous peoples' lands and in African-American, Latinx, and other communities of color, and the health effects of living near emissions sources should be accounted for in the generic environmental impact statement.

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. Nuclear Power must be given a fair seat at the table and the ability to compete alongside the heavily subsidized and deregulated power sources it is aiming to replace - fossil fuels such as coal and natural gas, and their VRE counterparts.

I urge you in the strongest possible terms to support this Generic Environmental Impact statement, in particular by enabling efficient review of clean power plants and the safeguarding of our future climate and clean air.

Sincerely,

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