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Submitter Information

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General Comment

I am writing in support of developing a GEIS for very small reactors.

Given the extremely small size of the reactors in question, and the correspondingly small radio-nuclide inventory, it is obvious that the potential for significant public harm (i.e., a significant number of deaths) from such reactors is small to non-existent. In addition to the small potential release, if a meltdown were to somehow occur, the probability of a meltdown is far lower than it is for large LWR reactors, due to the very small size and other fundamental factors. The lack of hazard for these reactors is fundamental, and is not dependent on active components functioning or operators performing. The degree of rigor in the licensing process should be in line with the level of potential hazard involved.

Fossil power generation, worldwide, causes hundreds of thousands of annual deaths, and is a significant contributor to global warming. Advanced/small reactors have a potential to replace significant amounts of fossil power generation. These small reactors have no potential to cause anywhere near the level of harm that fossil power generation does. Thus, the biggest risk to public health (and the climate), with respect to these reactors, is that they do not get built (or are not deployed on a large scale in the not-too-distant future). And one thing that could prevent their significant deployment is an overly-long and overly-costly licensing process. Thus, a streamlined licensing process for these reactors would result in *reduced* public health and climate risks. We need to look at the big picture.

Given that fossil power generators are still allowed to operate, nuclear reactors which pose a smaller public health risk should be allowed as well. Frankly, the criterion of acceptable risk for nuclear power plants should

be that they pose no more risk than fossil generation (per kW-hr generated). It is impossible for these small reactors to pose as much of a hazard, or inflict as much harm. These facts should be considered in decisions like this current proposal. The only justification for NOT streamlining the licensing process for these reactors would be if it could be shown, by rigorous and objective analysis, that the streamlined licensing process would result in small nuclear reactors whose overall public health risk is *greater* than that of fossil generation. It is clear that that could never be the case.

Please let your decisions be based on objectivity and science, as opposed to political pressures.