

From: sarah.uraniumwatch.org
To: [Beall, Bob](#); [Schrader, Eric](#)
Subject: [External_Sender] Request for Extension of Comment Period, Docket ID NRC-2015-0225
Date: Wednesday, June 24, 2020 7:04:54 PM
Attachments: [UW toNRC CommentExtension_NRC-2015-0225_062420.pdf](#)

Dear Mr. Beall and Mr Schrader,

Attached please find Request for Extension of Comment Period. Docket ID NRC-2015-0225.
Emergency Preparedness for Small Modular Nuclear Reactors and Other New Technologies;
Proposed Rule. 85 Fed. Reg. 28436; May 12, 2020.

Thank you for your attention to this request,

Sarah Fields
Program Director
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June 24, 2020

Robert Beall
Office of Nuclear Material Safety and Safeguards
Eric Schrader
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

RE: Request for Extension of Comment Period. Docket ID NRC-2015-0225.
Emergency Preparedness for Small Modular Nuclear Reactors and Other New
Technologies; Proposed Rule. 85 Fed. Reg. 28436; May 12, 2020.

Dear Mr. Beall and Mr. Schrader:

Uranium Watch hereby requests a 6-month extension of the comment period for the Proposed Rule re Emergency Preparedness for Small Modular Nuclear Reactors (SMRs) and Other New Technologies.

As today's meeting on the Proposed Rule demonstrated, this is a complex rule with many elements that will have a significant impact on the siting of small modular nuclear reactors, larger multi-module reactors, and other reactor technologies. There are many interdependent parts and factors.

This rule will impact the siting of a NuScale Power LLC design SMRs. The Nuclear Regulatory Commission (NRC) and Advisory Committee on Reactor Safeguards (ACRS) review of the NuScale Design Certification Application (DCA) is relevant to this Rulemaking, because is the first multi-module SMR design to be considered by the NRC. The ACRS is in the process of completing its review and will hold meetings regarding NuScale design on July 9-10¹ and July 21 to 25.² The Letter Report on NuScale Boron Redistribution will not be available

¹ <https://www.nrc.gov/docs/ML2017/ML20170A348.pdf>

² <https://www.nrc.gov/docs/ML2017/ML20170A337.pdf>

until the end of July, and the Final NuScale DC Letter Report will not be available until August. There will be NRC staff responses to these Letter Reports and possibly a need for further consultation. The tentative date for the final NRC Safety Evaluation Report, with no open items, is September 8, 2020.

These NuScale DCA documents are directly relevant to SMR Emergency Planning Rulemaking and should be available during the public comment period. For example, I would refer you to the June 1, 2020, ACRS Letter Report regarding the NuScale Probabilistic Risk Assessment and Emergency Core Cooling System Valve Performance.³

For this reason, the complexity of the Rulemaking, and number of related documents that need to be reviewed, I request a 6-month extension of the comment period. This extension will have no adverse impact on prospective licensees. The extension, if granted, will have a positive impact on the quality of the comments.

Sincerely,

Sarah Fields
Program Director
sarah@uraniumwatch.org

³ <https://www.nrc.gov/docs/ML2014/ML20149K596.pdf>