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**To:** [RulemakingComments Resource](#)  
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I am writing to convey my concerns about the NRC plans for emergency preparedness for small modular reactors.

First, as to the issue of safety, the concept of performance-based EP regulation sets an inadequate standard for unproven technologies, no matter how great they may sound on paper or in engineering calculations. The many unknown factors can create just as dangerous situations as the multiple incidents that we have experienced with existing LWRs. The safety standards, if anything, have to be set at a more rigorous level to ensure that, as the industry gains experience with these new technologies, no one shall be put at risk of the results of unanticipated events – which will of course ensue.

Second, as to security, I have grave doubts that the wider distribution of nuclear-powered plants will result in anything other than a much higher risk of security breaches and possible access by bad actors. Large LWRs have a large infrastructure that is conducive to an economically-scaled security force. Smaller, distributed reactors will be the target of mischief-makers of various kinds, yet it will not be economical to provide sufficient protection on an ongoing basis – including after decommission.

Finally, and most profoundly, until a final resolution for proper and safe disposal of nuclear waste is achieved, our society has no business generating any more waste. Nuclear waste products are highly dangerous for many hundreds of generations into the future, and it is incumbent upon us to consider the moral ramifications of saddling all of our descendants with the high costs of storing and protecting an ever-increasing toxic motherlode that was created for our temporal comforts.

In summary, I urge the NRC to reject the approval of any new nuclear-powered energy sources, and to shift focus to cleaner renewable energy sources.

Sincerely,

David L. Gluck, Ph.D.