

SUNI Review  
 Complete  
 Template=ADM-013  
 E-RIDS=ADM-03

<b>As of:</b> 1/7/21 7:16 AM <b>Received:</b> December 20, 2020 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1k4-9kr6-fh5h <b>Comments Due:</b> December 31, 2020 <b>Submission Type:</b> Web
---

# PUBLIC SUBMISSION

ADD: Shivani Mehta,  
 Charles Moulton,  
 Michael Eudy, Mary  
 Neely  
 Comment (2)  
 Publication Date:  
 11/16/2020  
 CITATION 85 FR  
 73089

**Docket:** NRC-2020-0230  
 Fire Protection for Nuclear Power Plants

**Comment On:** NRC-2020-0230-0001  
 Fire Protection for Nuclear Power Plants

**Document:** NRC-2020-0230-DRAFT-0004  
 Comment on FR Doc # 2020-25175

## Submitter Information

**Name:** Michael Keller  
**Address:**  
 14713 Woodward St  
 Overland Park, KS, 66223  
**Email:** M.KELLER@HYBRIDPWR.COM

## General Comment

Unclear how this guide can be applicable to passively safe advanced reactors.

For instance, the likely small operating crews are unlikely to be able to field a fire brigade.

The guide should state that it is limited to those water cooled reactors that employ active measures (e.g. pumping water, electrical power) to protect the public from hazardous radiation.

Applicability to passively fail safe advanced reactors should be along the lines of reliance on passive protection measures and automatic mitigation measures. For advanced reactors, the extent of the guide should also be limited to areas housing Safety-Related equipment, including structures and equipment that protect Safety-Related equipment.

Some form of general statement should be included on expectations for fire protection measures associated with passively safe advanced reactors. The statement might merely note that the matter needs further review.