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# PUBLIC SUBMISSION

**Docket:** NRC-2021-0048

Role of Artificial Intelligence Tools in Nuclear Plant Operations

**Comment On:** NRC-2021-0048-0001

Role of Artificial Intelligence Tools in U.S. Commercial Nuclear Power Operations

**Document:** NRC-2021-0048-DRAFT-0002

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## General Comment

Comments to Requested Information - Selected responses have been made where we feel we have knowledge to contribute.

AI and ML are emerging, analytical tools, which, if used properly, show promise in their ability to improve reactor safety, yet offer economic savings. The NRC requests comments on issues listed below in this solicitation to enhance the NRC's understanding of the short- and long-term applications of AI and ML in nuclear power industry operations and management, as well as potential pitfalls and challenges associated with their application.

1. What is status of the commercial nuclear power industry development or use of AI/ML tools to improve aspects of nuclear plant design, operations or maintenance or decommissioning? What tools are being used or developed? When are the tools currently under development expected to be put into use?

No-comment

2. What areas of commercial nuclear reactor operation and management will benefit the most, and the least, from the implementation of AI/ML? Possible examples include, but are not limited to, inspection support, incident response, power generation, cybersecurity, predictive maintenance, safety/risk assessment, system and component performance monitoring, operational/maintenance efficiency and shutdown management. No-comment

3. What are the potential benefits to commercial nuclear power operations of incorporating AI/ML in terms of (a) design or operational automation, (b) preventive maintenance trending, and (c) improved reactor operations staff productivity?

- If retraining is performed, designs could be more easily changed without worrying about how it integrates with the existing system.
- Staff productivity could increase as exposure would go down and the automatic training takes care of a lot of the labor intensive programming that might go into robots.

4. What AI/ML methods are either currently being used or will be in the near future in commercial nuclear plant management and operations? Example of possible AI/ML methods include, but are not limited to, artificial neural networks, decision trees, random forests, support vector machines, clustering algorithms, dimensionality reduction algorithms, data mining and content analytics tools, gaussian processes, Bayesian methods, natural language processing, and image digitization. No-comment
5. What are the advantages or disadvantages of a high-level, top-down strategic goal for developing and implementing AI/ML across a wide spectrum of general applications versus an ad-hoc, case-by-case targeted approach?
- As with all systems or systems, if a high-level, top-down approach is taken from the beginning, it can have more flexibility than targeted approaches. Our approach is a top-down approach that is purposefully vendor agnostic. In this way, the algorithms are transferable among sites that have different hardware and layouts.
6. With respect to AI/ML, what phase of technology adoption is the commercial nuclear power industry currently experiencing and why? The current technology adoption model characterizes phases into categories such as: the innovator phase, the early adopter phase, the early majority phase, the late majority phase, and the laggard phase.
7. What challenges are involved in balancing the costs associated with the development and application of AI/ML tools, against plant operational and engineering benefits when integrating AI/ML into operational decision-making and workflow management? No-comment
8. What is the general level of AI/ML expertise in the commercial nuclear power industry (e.g. expert, well-versed/skilled, or beginner)? No-comment
9. How will AI/ML effect the commercial nuclear power industry in terms of efficiency, costs, and competitive positioning in comparison to other power generation sources? No-comment
10. Does AI/ML have the potential to improve the efficiency and/or effectiveness of nuclear regulatory oversight or otherwise affect regulatory costs associated with safety oversight? If so, in what ways? No-comment
11. AI/ML typically necessitates the creation, transfer and evaluation of very large amounts of data. What concerns, if any, exist regarding data security in relation to proprietary nuclear plant operating experience and design information that may be stored in remote, offsite networks?
- The training environment, training data, and model all must be protected. If any of them are compromised, then one could influence the robot's actions.
  - Since the model is the most important part and the data will not be actively used, it is likely important that the model be stored.
  - The training environment and data will likely have proprietary information about the site. This will also need to be protected.