

From: [Ed Wallace](#)
To: [Tappert, John](#); [Moore, Scott](#)
Cc: ["Afzali, Amir"](#); GVCULLEN@energy-northwest.com; Chris.Nolan@duke-energy.com
Subject: [External_Sender] Endorsement of Southern Company Services et al May 2021 Part 53 letter
Date: Friday, May 28, 2021 1:53:10 PM
Attachments: [Endorsement of Southern Co et al letter of May 2021.docx](#)

Mr Trappert and Moore,

The attached letter is provided in support of the comments in the referenced Southern, Energy Northwest and Duke Energy letter. If you have any questions in this regard, please feel free to contact me.

All the best,

Ed Wallace

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May 28, 2021

Mr. John Tappert
Director, Division of Rulemaking, Environmental, and Financial Support
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Dear Mr. Tappert

As an active participant in the nuclear industry for over 50 years with direct involvement in the development of advanced reactor programs and related policies for the last two decades including most recently as a Senior Technical Lead of the Industry-led Licensing Modernization Project, I would like to express my full support of the letter sent by representatives of Southern Company, Energy Northwest, and Duke Energy regarding the path forward on NRC 10CFR Part 53. The letter can be found in the following link:

https://urldefense.proofpoint.com/v2/url?u=https-3A_adamswebsearch2.nrc.gov_webSearch2_main.jsp-3FAccessionNumber-3DML21144A276&d=DwMFAg&c=AgWC6NI7Slwpc9jE7UoQH1_Cvyci3SsTNfdLP4V1RCg&r=hOfUZB-EkJssErqyRI7fMgmugh-UI9PQtoL04Ia3-hM&m=j_7ynn52Btoog1jIcsgnQBC

Specifically, this letter recommends that the final rule for Part 53:

- Explicitly includes performance objectives of the regulation in the rule (e.g., frequency and consequence values for events from which Design Basis Accidents are selected and quantitative health objectives).
- Enables the development and deployment of owner-controlled programs for managing the reasonable assurance constituent of the regulatory mission (programmatic requirements, regulatory oversight programs, etc.) while enabling an effective and efficient regulatory inspection and enforcement framework.

I believe the inclusion of the recommendations is an essential step in achieving the full promise articulated in Commission policy statements for advanced reactors, ie, improved safety and reduced burdens for licensees and regulators alike.

Sincerely yours:

A handwritten signature in black ink, appearing to read "Edward G. Wallace".

Edward G. Wallace

President, GNBC Associates, Inc.

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Cc. Amir Afzali, Southern Company Services
Greg Cullen, Energy Northwest
Chris Nolan, Duke Energy