OKLO

July 2, 2021

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: Oklo Inc.
Maximum Credible Accident Methodology Topical Report
Performance-Based Licensing Methodology Topical Report

Oklo Inc. (Oklo) is submitting to the U.S. Nuclear Regulatory Commission (NRC) a Maximum Credible Accident Methodology Topical Report and Performance-Based Licensing Methodology Topical Report, as Enclosures 1 and 2 to this letter. These topical reports represent specific methodologies used to develop the licensing basis for Oklo's Aurora at Idaho National Laboratory combined license application. These methodologies are being submitted, in part, to support alignment and mutual understanding between Oklo and NRC staff on key safety and design aspects of the licensing basis.

In addition to the role these topical reports provide for progressing the Aurora at Idaho National Laboratory combined license application review, they can also play a key role in the future licensing of advanced nuclear reactors. Congress recognized the significance of nuclear power's capabilities of mitigating the impacts of climate change by enacting the Nuclear Energy Innovation and Modernization Act (NEIMA) in 2019[1]. NEIMA directs the NRC to develop a technology-inclusive licensing process for advanced nuclear reactors, enabling their timely and efficient deployment such that they can effectively contribute to the nation's decarbonization efforts. Oklo's licensing approaches support this exigent need by offering a set of performance-based licensing methodologies that are both technology-inclusive, but also enables both greater efficiency and stronger safety controls. It is therefore imperative that the NRC consider such approaches as it pursues regulatory framework development for advanced nuclear reactors.

It is in the public interest for the NRC to license plants with improved safety characteristics, in particular passive functions and inherent features. Further, it is in the public interest to ensure that regulatory controls are more efficiently and effectively applied directly to these functions and features. A better regulatory framework both ensures designs that are safe and facilities the commercialization of advanced nuclear power.

In recognition of the additional role of these topical reports, on June 17, 2021, Oklo also submitted a fee waiver request (ML21168A377) for the review of these topical reports, which specifically details the basis of the request. Oklo looks forward to engaging with NRC staff to support a decision on this request.

1 Nuclear Energy Innovation and Modernization Act, S.512, 115th Cong. (2019). https://www.congress.gov/bill/115th-congress/senate-bill/512/

If you have any questions or need any additional information, please contact us at regulatory@oklo.com or (650) 550-0127.

Sincerely,

Ross Moore
Director of Regulatory Affairs
Oklo Inc.

John Hanson
Director of Policies and Procedures
Oklo Inc.

Alexandra Renner
Director of Product
Oklo Inc.

Enclosures: (1) Oklo Maximum Credible Accident Methodology Topical Report
(2) Oklo Performance-Based Licensing Methodology Topical Report

CC (with enclosure):
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