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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

(ACRS)

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KAIROS POWER LICENSING SUBCOMMITTEE

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TUESDAY

JULY 6, 2021

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The Subcommittee met via Teleconference,
at 1:00 p.m. EDT, David A. Petti, Chair, presiding.

COMMITTEE MEMBERS:

- DAVID A. PETTI, Chair
- RONALD G. BALLINGER, Member
- VICKI M. BIER, Member
- DENNIS BLEY, Member
- CHARLES H. BROWN, JR., Member
- VESNA B. DIMITRIJEVIC, Member
- GREGORY H. HALNON, Member
- WALTER L. KIRCHNER, Member
- JOSE MARCH-LEUBA, Member
- JOY L. REMPE, Member
- MATTHEW W. SUNSERI, Member

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ACRS CONSULTANTS :

MICHAEL L. CORRADINI

STEPHEN SCHULTZ

DESIGNATED FEDERAL OFFICIAL :

WEIDONG WANG

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P R O C E E D I N G S

(1:00 p.m.)

CHAIR PETTI: The meeting will now come to order. This is a meeting of the Kairos Power Licensing Subcommittee of the Advisory Committee on Reactor Safeguards. I am David Petti, chairman of today's subcommittee meeting.

ACRS members in attendance are Charles Brown, Walt Kirchner, Joy Rempe, Matt Sunseri, Vicki Bier, Greg Halnon, Jose March-Leuba, Dennis Bley, Consultant Mike Corradini, Member Ron Ballinger, Consultant Stephen Schultz, Member Vesna Dimitrijevic. Weidong Wang of the ACRS staff is the Designated Federal Official for the meeting.

During today's meeting, the subcommittee will review and assess staff's safety evaluation on Kairos Power KP-FHR Fuel Methodology Topical Report, Revision 3. The subcommittee will hear presentations by and hold discussions with the NRC staff, Kairos Power representatives, and other interested persons regarding this matter.

The part of the presentations by the applicant and the NRC staff may be closed in order to discuss information that is proprietary to the licensee and its contractors pursuant to 5 U.S.C.

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2 Attendance at the meeting that deals with
3 such information will be limited to the NRC staff and
4 its consultants, Kairos Power, and those individuals
5 and organizations who have entered into an appropriate
6 confidentiality agreement with them. Consequently,
7 we need to confirm that we only have eligible
8 observers and participants in the closed part of the
9 meeting.

10 The rules of participation in all ACRS
11 meetings, including today's, were announced in the
12 Federal Register on June 13th, 2019. The ACRS section
13 of the U.S. NRC public website provides that charter,
14 bylaws, agendas, letter reports, and full transcripts
15 of all full and subcommittee meetings including the
16 slides presented here.

17 The meeting notice and agenda for this
18 meeting were posted there. We have received no
19 written comments or requests to make an oral statement
20 from the public.

21 The subcommittee will gather information,
22 analyze relevant issues and facts, and formulate
23 proposed positions and actions as appropriate for
24 deliberation by the full committee. The rules for
25 participation in today's meeting have been announced

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1 as part of the notice of this meeting previously
2 published in the Federal Register.

3 A transcript of the meeting is being kept
4 and will be made available as stated in the Federal
5 Register Notice.

6 Due to the COVID pandemic, today's meeting
7 is being held over Microsoft Teams for ACRS, NRC
8 staff, and the licensee attendees. There is also a
9 telephone bridge line allowing participation of the
10 public over the phone.

11 When addressing the subcommittee, the
12 participants should first identify themselves and
13 speak with sufficient clarity and volume so they may
14 be readily heard. When not speaking, we request that
15 participants mute their computer microphone or phone.

16 With that, we'll now proceed with the
17 meeting and I'd like to start by calling up NRC Staff,
18 Sam.

19 MR. CUADRADO DE JESUS: Yes, good
20 afternoon. I'll be covering for Stu Magruder, the
21 program manager who is not available this week. I
22 believe for the technical staff we'll have my branch
23 chief, William Kennedy, Duke, making some introductory
24 remarks.

25 Duke, are you there?

1 MR. KENNEDY: Yes, I'm here. Okay, well,
2 good afternoon, everyone. I'd like to give a few
3 introductory remarks here.

4 Again, my name is William Kennedy. I'm
5 the acting branch chief of the Advance Reactor
6 Licensing Branch. So the staff is looking forward to
7 discussions with and feedback from the ACRS members
8 today on the draft safety evaluation for the Kairos
9 Power topical report, KP-HFR field performance
10 methodology.

11 And as you'll hear, this topical report is
12 important for Kairos' safety case and is related to
13 other topical reports such as the mechanistic source
14 term and field qualification reports.

15 Note that this meeting is the third time
16 the staff and Kairos Power have had the opportunity to
17 brief the ACRS on Kairos' topical reports and staff
18 has appreciated the helpful comments from the ACRS on
19 topical reports covering the reactor coolant, scaling
20 methodology, and licensing modernization project
21 implementation.

22 The staff looks forward to working with
23 Chairman Petti and the rest of the members and staff
24 over the next several years as we complete reviews of
25 more Kairos Power topical reports and prepare for

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1 license applications for facilities that we use the
2 Kairos Power design.

3 I'd just like to highlight that the
4 working relationship between NRC staff and Kairos has
5 been excellent and similar to previous reviews of
6 Kairos Power topical reports, we've used public
7 meetings as a means for addressing technical issues
8 without the need for many requests for additional
9 information.

10 And finally, I'd just like to say thank
11 you to the technical staff from the Advanced Reactor
12 Technical Branch for their efforts to produce a high
13 quality draft safety evaluation and also thanks to the
14 staff from the Office of Research for their valuable
15 support. So that concludes my introductory remarks.
16 Thanks, Sam.

17 MR. CUADRADO DE JESUS: Yes, you are
18 welcome. Thank you, Duke.

19 I also want to say that for the closed
20 portion of the meeting, we'll have the tech staff give
21 the presentation. That will be Jeff Schmidt, who is
22 the lead for the topical report review, and we'll also
23 have a report from Boyce Travis and Antonio Barrett.
24 That's for the closed portion of the meeting.

25 Back to Kairos. Thank you.

1 MR. TOMKINS: Okay, this is Jim Tomkins
2 from Kairos Power. And we have a couple of
3 presentations we're going to do today. Micah Hackett
4 will be presenting an overview of Kairos, our design,
5 and topical report. And Blaise Collin, during the
6 closed session will be talking in detail about the
7 topical report.

8 So we welcome this opportunity. We're
9 interested in feedback. And I will say we intend to
10 use this topical report both for our Hermes reactor
11 and for eventual full size KP-FHR. So this is very
12 important to us and very important to the safety case
13 for Kairos Power.

14 With that, I'm going to turn it over to
15 Micah Hackett who is our director of fuels and he's
16 going to provide an opening.

17 MR. HACKETT: Thank you, Jim. I'm going
18 to start with Kairos Power's mission statement which
19 is to enable the world's transition to clean energy,
20 with the ultimate goal to dramatically improving
21 people's quality of life while protecting the
22 environment.

23 While many of you are probably familiar
24 already, and I understand there are a few new
25 committee members who may not have a full

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1 understanding, so I'll quickly go through some
2 background on the fluoride salt-cooled, high
3 temperature reactor concept.

4 It is a pebble bed reactor. A pebble bed
5 reactor is based on the TRISO fuel particle. I
6 believe all of you are familiar already, but we are
7 planning to use a UCO or uranium oxycarbide kernel.
8 The kernel is then surrounded by a number of layers of
9 pyrolytic carbon and silicon carbide. And this forms
10 the basis of a fuel form that through the AGR program
11 has demonstrated the ability to retain fission
12 products and be very robust even in accident
13 conditions.

14 This TRISO fuel particle is then contained
15 with an annular pebble and I will show that sign in a
16 later slide here. We're coupling that TRISO fuel
17 technology with a liquid fluoride self coolant, the
18 same coolant used as the base in the liquid fuel MSRE
19 reactor demonstrated at Oak Ridge National Laboratory.
20 This is the lithium fluoride beryllium fluoride
21 coolant that will enable us to have a low pressure
22 reactor system. We do not need to pressurize the
23 reactor in order to maintain the coolant and the fuel.
24 And all of these are technologies that have been
25 demonstrated in some part or fashion through other

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1 reactor technologies and what is unique is that Kairos
2 is combining three different technology sets into a
3 new reactor design concept.

4 I want to spend a moment talking through
5 some of our recent progress and highlights. Kairos
6 started at the end of 2016. By 2018, we had built out
7 an entire office and laboratory in Alameda, California
8 that became our rapid prototyping and technology
9 development facility. This facility has allowed us to
10 be able to use water-based experiments, high
11 temperature oil-based experiments as surrogates for
12 many of the different systems and components that we
13 wanted to test the design for a full scale reactor
14 program. But we have learned a great deal of
15 information at a smaller scale about how our
16 technology will work and how all of these parts and
17 pieces will come together through this rapid
18 prototyping laboratory.

19 We also designed and built out within this
20 a lab specifically for containing beryllium so that we
21 can use FLiBe and do both FLiBe chemistry experiments
22 and also a significant amount of materials testing
23 within our facility here at Alameda. So this is a
24 dedicated facility where folks can go in and work with
25 FLiBe and be protected while doing so.

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1 Last year, we procured a site in
2 Albuquerque, New Mexico. This was an existing
3 facility to which we have made a very large addition
4 as the T-facility. And the T-facility will again be
5 a dedicated beryllium facility where we will build out
6 by the end of this year the engineering test unit. So
7 we will have a non-nuclear representation of what our
8 Hermes reactor will look like, not fully prototypic,
9 but testing out again many of the different component
10 systems from which we want to learn and understand how
11 the technology will work so that we can de-risk the
12 program as much as possible.

13 CHAIR PETTI: So I have a question on the
14 T-facility. Is it an individual component test
15 facility sort of thing or is it integrated in that you
16 might have multiple components and be looking at
17 integral behavior?

18 MR. HACKETT: That's a great question and
19 the answer will (audio interference).

20 CHAIR PETTI: Okay.

21 MR. HACKETT: So what we're focused on
22 right now is an integrated test unit that is the
23 engineering test unit that I spoke of.

24 We also will have many single components
25 where we will do -- and single effects testing on

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1 specific components where we want to learn and do more
2 (audio interference).

3 CHAIR PETTI: What is the size of the
4 facility? Do you know?

5 MR. PETERSON: Sixty-five feet tall, 100
6 feet wide and 400 feet long. That's the addition.

7 MR. HACKETT: This was Per Peterson. And
8 I'll just repeat really quickly what he shared. One
9 hundred feet wide, 400 feet long, 65 feet tall, that's
10 the dimension of this new addition that we have
11 completed construction on.

12 MEMBER REMPE: Are you planning some tests
13 of the graphite pebbles' interactions with the molten
14 salt at this S-lab to see if there's any degradation
15 and then how will you consider any sort of radiation
16 that's in such a test -- after you've completed such
17 a test?

18 MR. HACKETT: I'll start with the last
19 part of that. This is a non-nuclear facility. So the
20 radiation pieces --

21 MEMBER REMPE: I understand that. I have
22 a question even if you find out there's no
23 interactions in non-nuclear environment, where will
24 you look for any sort of radiation effects on the
25 results?

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1 MR. HACKETT: So there have been
2 experiments done at MIT looking at the effect of
3 radiation and graphite in a FLiBe environment. So we
4 will leverage that information.

5 MEMBER REMPE: To what clearance level?

6 MR. HACKETT: Off the top of my head, I
7 don't know what the peak fluence levels that they have
8 tested their graphite up to.

9 MEMBER REMPE: And then are you going to
10 do some non-nuclear tests at the S-Lab to try and see
11 if there's any other effects that you need to capture
12 such as temperature or other things?

13 Because again, if you're claiming that the
14 FLiBe is a barrier for radiation transport, one needs
15 to make sure that barrier doesn't degrade other
16 barriers, right?

17 MR. HACKETT: So I'll try to address
18 multiple parts of that and I appreciate the question
19 and understand the basis for the question.

20 We do have a lot of tests that we are
21 planning with graphite in FLiBe in multiple different
22 facilities or multiple different tests. The
23 engineering test unit is one where we will have
24 essentially a prototype of what our first
25 demonstration reactor will look like and we will be

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1 circulating the graphite pebble in the FLiBe salt.

2 As far as interaction, we do know quite a
3 bit from MSRE on graphite in FLiBe salt coolant and
4 any effects of a radiation on that graphite. So we
5 understand how a radiation plus graphite plus FLiBe
6 interact based on the MSRE experiment.

7 We have experiments such as tribology
8 testing and salt infiltration testing. The tribology
9 testing is already operational, but it is not
10 something that we go into detail here in this
11 presentation or in this meeting, but we are testing
12 the effects of where an abrasion or friction, for
13 example, of the graphite fuel pebble in a FLiBe salt
14 coolant.

15 So that's giving you just a quick overview
16 of the different types of effects testing that we are
17 planning.

18 MEMBER REMPE: Thank you.

19 CHAIR PETTI: Micah, just a clarification.
20 The pebble is not graphite, right? It's matrix
21 material.

22 MR. HACKETT: It's material that's
23 partially graphitized. That's correct.

24 CHAIR PETTI: Partially, right. Yes.

25 MR. HACKETT: Correct.

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1 CHAIR PETTI: Thank you.

2 MR. HACKETT: Yes.

3 MEMBER BALLINGER: This is Ron Ballinger.
4 Are you, folks, I guess in parallel, accumulating
5 experience with beryllium and the like that might be
6 applicable for a larger facility on an industrial
7 scale that's going to be helpful?

8 MR. HACKETT: Absolutely. And I can say
9 from our partner, Materion, who is a leading producer
10 of beryllium and has developed all of the safety
11 programs on safe handling of beryllium, our
12 partnership with them has taught us a great deal. We
13 are putting that learning to practice here in our S-
14 laboratories that I'm showing. It will be put into
15 use in our T-facility so that way we are learning how
16 to be able to work with beryllium products safely
17 without risking the health of our employees or
18 creating additional hazards.

19 MEMBER BALLINGER: I'm sure you're
20 concerned of your employees. I would be more concerned
21 about your customers' employees.

22 MR. HACKETT: Understood and I think part
23 of the purpose of protecting our employees would be,
24 of course, by protecting our employees and learning
25 how we're protecting our employees, any future folks

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1 who might come into the facility would also be
2 protected.

3 MEMBER BALLINGER: Okay. Thank you. Just,
4 if you know, if we build one of these things and
5 operate it commercially that's a little bit different
6 than a very, very, very controlled environment for
7 testing.

8 MR. HACKETT: Yes, I agree completely and
9 I think the S-Lab is our first opportunity for really
10 learning in a very controlled environment. But then
11 the T-facility, as a much larger facility, that is not
12 similar to the size and scale of what our
13 demonstration reactor facility will look like. That
14 will give us an opportunity to prove out our ability
15 to maintain health and safety at a facility that's at
16 scale.

17 MEMBER BALLINGER: Thank you.

18 CHAIR PETTI: So the procedures you use,
19 the T-facility will kind of inform the procedures that
20 you -- operating procedures you use in your demo.

21 MR. HACKETT: Absolutely.

22 CHAIR PETTI: Yes.

23 MR. HACKETT: So continuing on, we have
24 announced our decision earlier this year on the Hermes
25 reactor site selection so this is where we plan to

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1 place our first demonstration reactor. This will be
2 on the East Tennessee Technology Park next to the Oak
3 Ridge National Laboratory in Tennessee.

4 Just to briefly mention some of the
5 external awards and work that we are doing with
6 different partners. We were awarded an NRC funding
7 opportunity announcement, I'm sorry, not an NRC -- a
8 DOE funding opportunity announcement on licensing risk
9 reduction.

10 We have been in engagement with the NRC.
11 We are in a cooperative development agreement with TVA
12 on collaboration for Hermes. And finally, we are an
13 award winner from a tier 2 award for DOE's advanced
14 reactor demonstration program on a risk reduction
15 award that will be used to support the Hermes
16 demonstration reactor deployment.

17 For the design approach in the reactor
18 concept itself, we have robust inherent safety. That
19 comes from multiple different areas of the reactor
20 design. Ones that I will mention here is the fact
21 that with our annular pebble design, and the fact that
22 we have a liquid coolant in both operating conditions
23 and in accident conditions, we have very large margins
24 in the fuel temperature between what peak fuel
25 temperatures will be in our fuel and what types of

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1 fuel has already demonstrated in safety case to be
2 able to withstand peak temperature before failure.

3 And so we are not crediting the pebble
4 itself or any retention of fission products, but the
5 trace of particle does retain fission products. And
6 in addition, the coolant also has excellent retention
7 of most fission products. And that combined with a
8 low pressure system where we do not have concern with
9 high pressure release and effective passive decay heat
10 removal, all of these are features of the FHR design
11 that allow us to have that inherent safety in the
12 concept.

13 A big part of the flowing nuclear force is
14 being able to achieve a lower capital cost in order to
15 be economically competitive although a major strategy
16 in our program is to design and iterate in that design
17 through slowly scaling our concepts here starting with
18 this engineering test unit demonstration experiment
19 that was deployed in Alameda with non-nuclear water-
20 based systems. We learned a great deal about that in
21 order to design and now under construction for the
22 engineering test unit, again, will be a non-nuclear
23 FLiBe-based system. And the learnings from that,
24 similar size and scale, will inform our Hermes reactor
25 demonstration program.

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1 And then, of course, Hermes is just
2 another step in our ability to achieve the fullest
3 commercial scale. We are planning, as a follow on to
4 the Hermes reactor, a full-scale unit that will mimic
5 in scope and prototyping the full scale commercial
6 reactor that will be a non-nuclear unit. This is our
7 U-facility reactor demonstration unit and that will be
8 full scale, allow us to exercise the supply chain and
9 construction in order to then inform how to construct
10 a full size commercial plant.

11 DR. CORRADINI: This is Corradini. I have
12 a question. Is there a public document? Because each
13 of these are progressive step in advancing the
14 technology as to the objectives. You kind of went
15 through it in a summary fashion, but is there a public
16 document that one can read to understand the objective
17 of each of these test facilities before you get to the
18 commercial plant scale, the demonstration?

19 MR. HACKETT: Yes, that's a great
20 question. I would have to follow up offline. We
21 have made presentations like this publicly.

22 MR. TOMKINS: There is a technical report
23 on the testing program that we submitted.

24 DR. CORRADINI: Okay. So if you could
25 just give us a reference to that, that would be very

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1 helpful because I think your summary is good, but
2 trying to put it all together after your oral
3 discussion would be helpful with some written public
4 document.

5 MR. TOMKINS: Yes, that was Jim Tomkins
6 speaking. I just mentioned that we did submit a
7 technical report on our testing program, although I
8 don't know that it has everything that's in this slide
9 in it. But that laid out kind of our plans for
10 testing. I'll get that to Weidong.

11 DR. CORRADINI: Thank you very much.

12 MR. HACKETT: So moving on, I had
13 mentioned already the TRISO fuel in our pebble form
14 and discussed the core designs with the pebble bed
15 concept. The pebbles are designed to be positively
16 buoyant in FLiBE so that they slope at all times in
17 the FLiBE. That, of course, means that they are
18 inserted at the bottom of the reactor and extracted at
19 the top of the reactor.

20 We do plan to eventually use a mixture of
21 both fuel and moderator pebbles in order to operate
22 the reactor at the optimal moderation. And the fuel
23 pebble itself contains the -- this is the diagram on
24 the right --- in the annular region we have the TRISO
25 coated fuel particles that are embedded in a

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1 partially-graphitized matrix. And the baseline fuel
2 design that we are using is the AGR coated particle
3 (audio interference).

4 The pebble handling system itself monitors
5 the condition of the burn up so that we have an
6 opportunity to extract pebbles if they become damaged
7 before reinserting them back into the core. And also
8 that when the pebbles reach the full burn up that we
9 have an opportunity to be able to extract them and
10 insert new fresh fuel pebbles.

11 MEMBER REMPE: So let me just ask the
12 question again since we have this nice picture here.
13 You have data showing that the matrix shell can resist
14 any sort of interactions with the coolant. And then
15 is it so secure that you feel comfortable that you
16 know it doesn't also have any sort of interaction with
17 the density graphite?

18 And then, have you ever gone far enough to
19 say I know it won't even interact with the silicon
20 carbide if something were to happen?

21 I mean how much data do you have for that?
22 I'm not sure I know all the details of the MIT test.

23 MR. HACKETT: Sure. So I'll just share
24 that we are collecting that data now, so we do not
25 have all of that data to share and to present today.

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1 But we are in the process of collecting all of that
2 test data to be able to demonstrate those concerns
3 that you highlighted.

4 MEMBER REMPE: Because yes, if you're
5 going to have -- you have these two barriers and if
6 there's any concern about one barrier degrading
7 another barrier, we really ought to know about it.

8 MR. HACKETT: Absolutely.

9 MR. TOMKINS: This is Jim Tomkins again.
10 We have a fairly extensive laboratory testing program
11 that's part of our fuel qualification. This meeting
12 today is not actually talking about qualification of
13 the fuel. This is really talking about the
14 qualification of our fuel performance model.

15 MEMBER REMPE: But that model must
16 account for any degradation, right?

17 MR. HACKETT: Correct.

18 MR. COLLIN: This is correct. The
19 assumption is that these -- this is Blaise Collin by
20 the way. The assumption of this board is that our
21 laboratory testing program will inform us about
22 potential interactions between the FLiBe and the
23 pebble. At this point, we assume that these
24 interactions are not degrading the performance of the
25 fuel, but obviously, depending on the findings of

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1 these tests, we would have potentially to account for
2 such interactions. But at this point, we assume that
3 the systems do not interact in a deleterious way.

4 MR. HACKETT: And I'll just share that
5 between MSRE showing compatibility between FLiBe and
6 graphite, and again, this is not full graphite. It is
7 just partially graphitized, but between that
8 experience and ATTR experience of pebble circulating,
9 of course, in helium, but circulating nevertheless, we
10 do have some confidence that our tests will be
11 successful, but of course, it is upon us to conduct
12 those tests.

13 Any other questions on that? So talking
14 about the purpose of our fuel performance methodology
15 and the topical report. The methodology for our fuel
16 performance is to determine the probability of TRISO
17 fuel particle failure and fission product release that
18 support the KP-FHR source term basis. That is the
19 objective of the fuel performance model that we are
20 discussing here today.

21 The methodology limits the validation of
22 representative conditions for the KP-FHR and Kairos
23 Power has requested NRC to review and approve the use
24 of KP-BISON fuel performance analysis methodology and
25 uncertainty qualification methodology for conducting

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1 fuel fluent analysis that supports the KP-FHR safety
2 analysis.

3 And Blaise will be going into a lot more
4 detail later in this meeting. That just sets the
5 stage for all of Blaise's much more technical
6 discussion on the fuel performance model.

7 The methodology is really the fuel's
8 ability to -- of the nuclear fuel to sustain radiation
9 damage while maintaining integrity of those physical
10 barriers that prevent the release of fission products.
11 So KP-BISON is an analytical model based on the INL
12 BISON code. It is using constitutive equations while
13 in analytical relationships. All of that has been
14 developed based on experimental data, much of it
15 collected from the ACR program and, of course,
16 programs prior to that in order to assess probability
17 of failure of those different particle layers, as well
18 as the potential release for fission products
19 regardless of whether or not the layers have failed.

20 KP-BISON is used to predict performance of
21 our trace of fuel under the normal operating
22 conditions as well as postulated events. And the
23 methodology is based on the KP-FHR fuel design
24 specifically. It does include a consideration of the
25 fuel coolant uncertainties in order to calculate that

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1 probability of failure and fission products released.

2 MEMBER REMPE: So I had some questions
3 about the prior slide. Correct me if I'm wrong and I
4 sort of asked this question when you guys came before
5 ACRS a while back. But this is the first time a
6 design developer with the DOE codes for a licensing
7 application or a topical report.

8 And I asked last time and they said it was
9 unclear that representative from Kairos. But if you
10 were to go forward and have a plant, how would this
11 work? Is DOE going to give you some sort of
12 authorization that you can sell the suite of codes in
13 the long term to a plant owner/operator?

14 And then I guess I had some questions
15 about the QA aspects of what you're planning on doing
16 since clearly, you still have to get data to valid the
17 code.

18 I assume the INL code was developed or the
19 DOE code was developed with appropriate QA, so at
20 least it's verifying even if they don't have all the
21 data for it. But then how will -- what's your process
22 going to be for the V&V?

23 MR. HACKETT: Brandon, are you on the
24 line?

25 MR. HAUGH: Yes, I can take this. This is

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1 Brandon Haugh, the director of Model Installation for
2 Kairos Power.

3 Great question, Joy. Thanks. So on the
4 commercial terms of that, we have options in our
5 agreement with DOE. We sort that when we get there.
6 So that exact method of how licensing would work and
7 how in a commercial sense is, I'm going to say a
8 future discussion. But it's in the terms of what we
9 discussed with DOE.

10 On the code QA, you are correct. It was
11 developed under an NQA-1 compliant software quality
12 program and it's been audited and the audit is at INL.

13 Now we were going to commercially dedicate
14 those codes within our own quality assurance program
15 and audit INL in their program and then we'll carry it
16 to the finish line, as you said, through validation.

17 That validation data we have a plan that's
18 been issued internally and is a reference to this
19 topical report and it determines, you know, how we're
20 going to do that validation based on the current
21 available data through the HER program. And then as
22 we gain operational experience and other things that's
23 described in our fuel qualification plan, more data
24 could become available.

25 MEMBER REMPE: So I get that validation is

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1 going to have to come when the data become available,
2 but given the fact that you started out with an NQA-1
3 verified code, why didn't you go ahead and verify it
4 before you submitted this topical report?

5 MR. HAUGH: We've been in the process of
6 doing that in partnership with INL, so through the
7 code development process or our industry FOA award,
8 we've been working hand in hand through verifying each
9 piece of the tool as it's implemented, so that
10 verification occurs while code is being developed.

11 Validation is ongoing, so we are working
12 through that now and it's a continuing effort over the
13 coming years.

14 We wanted to get the basis for our work
15 and licensing certainty is why we took kind of this
16 two-step approach to the topical report while the
17 limitations and conditions (audio interference) we can
18 mediate the upfront methodology and getting
19 understanding of that was very important to us. One,
20 because it's the first time this code is being used
21 for this type of fuel in a commercial sense in front
22 of the regulator and two, getting -- understanding of
23 how the code will be used and the scope of its use in
24 our validation and safety case allows us to have
25 certainty moving forward that we're doing the correct

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1 work in validation to make sure that we meet those
2 requirements versus us having to guess ahead of time
3 and then get regulatory buy-in later, maybe we do too
4 little or too much work.

5 MR. TOMKINS: And I might add, this is Jim
6 Tomkins again, that verification and validation is a
7 defined open item in this topical which we have to
8 close and we will do it at a later date.

9 CHAIR PETTI: So just a point of
10 clarification that might help when you guys come to
11 the full committee in September, you see that we've
12 been bumping into topics sort of peripheral to what
13 we're hearing about today, sort of a road map of stuff
14 that you're planning to submit later that lays out the
15 landscape could be helpful, I think, for members to
16 understand. You know, yes, we know about this one
17 over here. We're planning to submit that, you know,
18 in the future. But everyone sees the full picture.

19 MR. TOMKINS: So we have submitted a
20 regulatory engagement plan which has that information
21 in it. I think we've updated that at least once, so
22 you know, NRC can provide you that or we can get it to
23 you. It lays out all the topicals we're doing and
24 kind of when we're submitting them.

25 Does that answer --

1 CHAIR PETTI: Yes.

2 MEMBER HALNON: This is Greg Halnon. I
3 have a question and both are on slide 8. And I'm one
4 of those that I'm not sure how far along you are on
5 your design for the actual plant, but how did you
6 define an envelope of operating conditions and define
7 postulated events so that we know that performance
8 behavior is well bounded by your analyses?

9 MR. HAUGH: Yes, I'll go ahead and take a
10 stab at that. His is Brandon Haugh, another good
11 question.

12 So we looked at the envelope conditions of
13 how we're designing the plant at the top level
14 requirements so the operating conditions and
15 surrounding and then using for Hermes is a test
16 reactor, the basis in NUREG-1537, so constructed
17 deterministic events bound to those using an MHA
18 process.

19 So when we get the applicability of these
20 tools within kind of a box of what the plant lives
21 within.

22 MEMBER HALNON: So when you get to the
23 actual building of the plant, I guess it's probably
24 more in the design certification of the licensing
25 process where you take a look at the full plant, make

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1 sure the postulated events you did under this
2 methodology is bounded by the actual assumed
3 operational occurrences that occur during -- with the
4 actual plant design?

5 MR. HAUGH: Yes, yes, as we went through
6 that final design or moved through those design phases
7 (audio interference) called out in terms of either
8 technical specifications or conditions we have to
9 live within. That's one of the bases of the safety
10 case.

11 MEMBER HALNON: Okay, if you can't drive
12 to within the envelope here, you'll have to redo the
13 analysis then.

14 MR. HAUGH: Exactly.

15 MEMBER HALNON: Okay, thanks.

16 MEMBER REMPE: Again, I guess the road map
17 would help me, but are you planning to bring this back
18 in with an updated topical report after you validated
19 and verified it and after you have data for postulated
20 events, as well as normal operating conditions?

21 MR. TOMKINS: Yes. If that's what the
22 committee desires, yes.

23 MEMBER REMPE: I mean that is your plan.
24 I mean the staff has put a lot of limitations and
25 conditions on their approval and it sounds like you

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1 almost have to come back again, doesn't it?

2 MR. HACKETT: Yes, that is part of the
3 plan, after we perform the verification and
4 validation, we will be updating the topical report in
5 another revision, including all that information and
6 that will be submitted to the NRC at a future date.

7 And so Joy, coming back to one of your
8 earlier questions about validation, the data, this is
9 the final slide in the introduction of KP-BISON. The
10 plan is to validate this model through the use of
11 historical radiation data, much of it coming from AGR-
12 1 and 2 manufacturing and radiation campaign and that
13 includes the topical report that EPRI led in
14 coordination with INL and submitted to the NRC.

15 So much of the AGR 1 and 2 radiation data
16 is included in that topical and is going to be used
17 for part of the verification/validation program of the
18 KP-BISON. And a lot of that is being done through our
19 model development as Brandon already mentioned through
20 the DOE iFOA licensing award that we received in 2019.
21 And the purpose of that was really to accelerate the
22 licensing pathway through the DOE NEAMS program.

23 Any other questions on that or anything
24 else for the introduction?

25 MR. CUADRADO DE JESUS: Jim, this is Sam.

1 I see here a revision to the engagement plan was
2 provided on December 2020. Is that the latest version
3 I guess?

4 MR. HACKETT: I think so, yes.

5 MR. CUADRADO DE JESUS: Okay, so I can
6 send that to Weidong.

7 MR. TOMKINS: All right, we're done at
8 this point.

9 Weidong, what's the next step? Do we
10 switch for the -- or do you take it from here?

11 MR. WANG: Hi. This is Weidong. I think
12 the next is for public comments because we are in a
13 closed meeting for the next two or three hours, so I
14 suggest to ask for any public comments at this point.

15 CHAIR PETTI: There's no other staff
16 slides at this point, is that true?

17 MR. CUADRADO DE JESUS: Correct.

18 CHAIR PETTI: Okay. Great. So let's open
19 the public line.

20 MR. DASHIELL: The public line is open for
21 comments.

22 CHAIR PETTI: Any comments from the
23 public? Well, not hearing any, I guess we can close
24 the open meeting and everybody get on the closed
25 meeting link. We'll see everybody in about five

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1 minutes hopefully. Okay, we'll see everybody there.

2 (Whereupon, the above-entitled matter went
3 off the record at 1:43 p.m.)
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Kairos Power

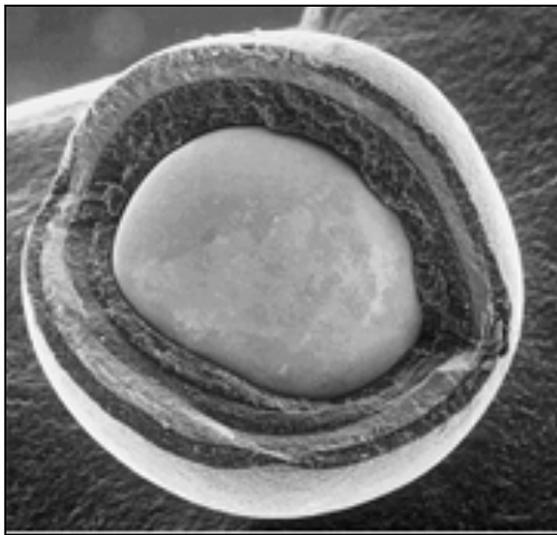
KP-FHR Fuel Performance Methodology Topical Report

ACRS Kairos Power Licensing Subcommittee
OPEN SESSION

JULY 6, 2021

Fluoride Salt-Cooled High-Temperature Reactor (FHR) Technology Basis

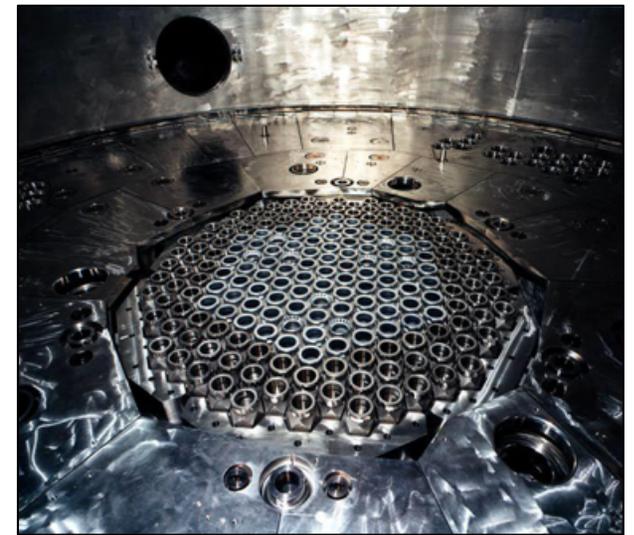
Coated Particle Fuel
TRISO



Liquid Fluoride Salt Coolant
Flibe (2LiF-BeF2)



Low-Pressure Reactor Vessel
(FFTF core shown)



Kairos Power Highlights of Recent Progress

Internal Milestones and Accomplishments:



R-Lab

Rapid Prototyping and
Technology Development



S-Lab

Flibe Chemistry and
Materials Testing Lab



T-Facility
Engineering Test Unit
New Mexico Expansion



Hermes Reactor Site Selection
East Tennessee
Technology Park

External Awards and Validation:



Nuclear Regulatory Commission
Pre-Application Engagement



Cooperative Development Agreement
Development & Demonstration Collaboration for
Hermes



**DOE Advanced Reactor Demonstration
Program (ARDP)**
Risk Reduction Award

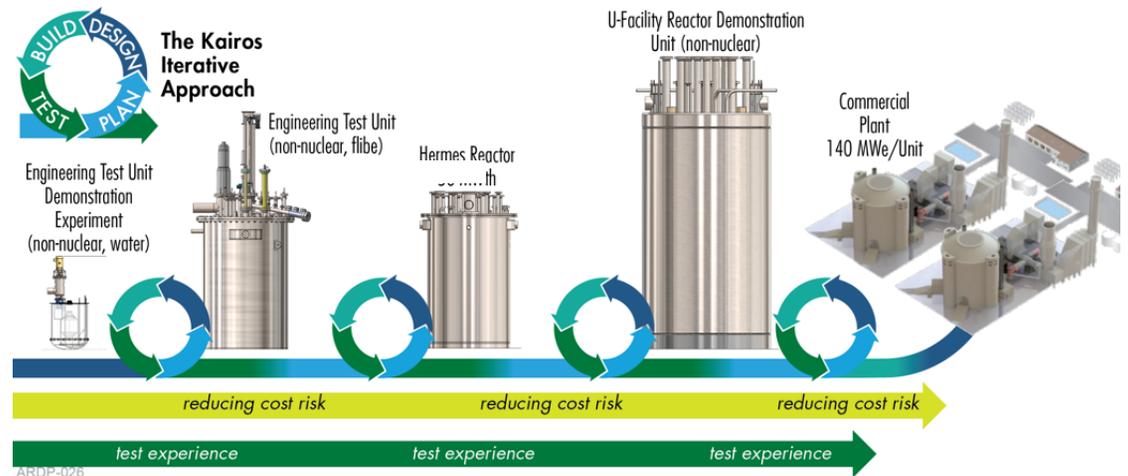
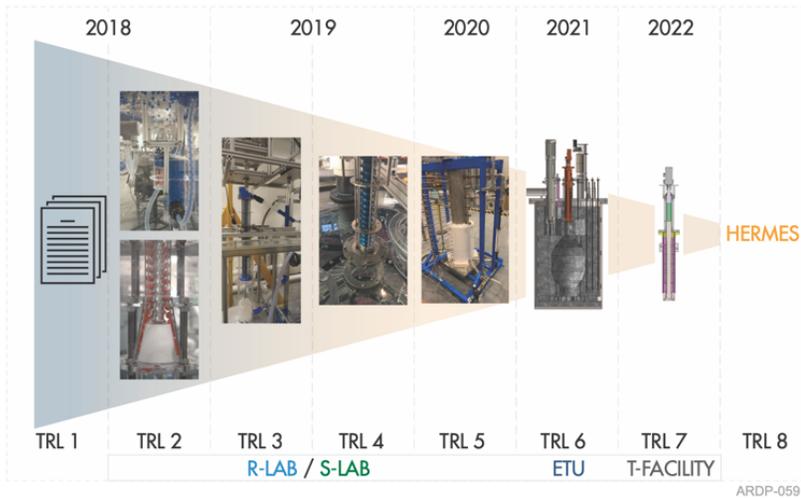
Kairos Power Design Approach for Hermes Demonstration Reactor

- **Robust Inherent Safety**

- Uniquely large *fuel temperature margins*
- Retention of fission products in primary coolant
- Low-pressure system
- Effective passive decay heat removal

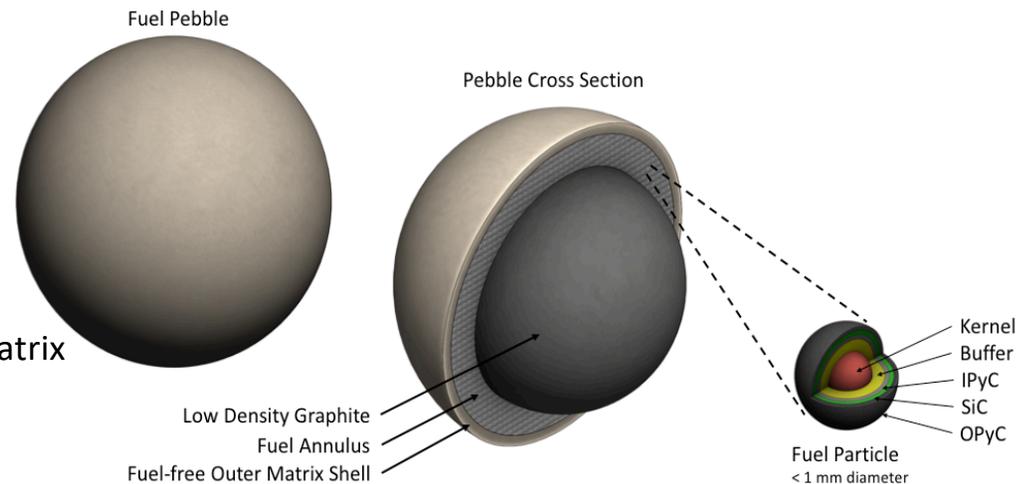
- **Lower Capital Costs**

- Reduce requirements for high-cost, nuclear-grade components and *structures* through FHR intrinsic safety and plant architecture
- Leverage conventional materials, existing industrial equipment, and conventional fabrication and construction methods



KP-FHR Uses TRISO Fuel in Pebble Form

- Core design is a pebble bed concept within a graphite reflector
 - Pebbles are positively buoyant in Flibe
 - Mixture of fuel and moderator pebbles operates with optimal moderation
- Fuel particles:
 - Tri-structural isotropic (TRISO)-coated fuel particles embedded in a **partially** graphitized matrix
 - Baseline fuel uses AGR coated particle design
- Pebble handling system monitors condition and burnup
 - Fuel reaches full depletion in 1.4 effective full power years
 - Rapid depletion reduces total fuel inventory and enables accelerated development of advanced fuel designs



4.0-cm diameter, annular fuel pebble is the same size as a ping-pong ball

Purpose of Fuel Performance Methodology Topical Report

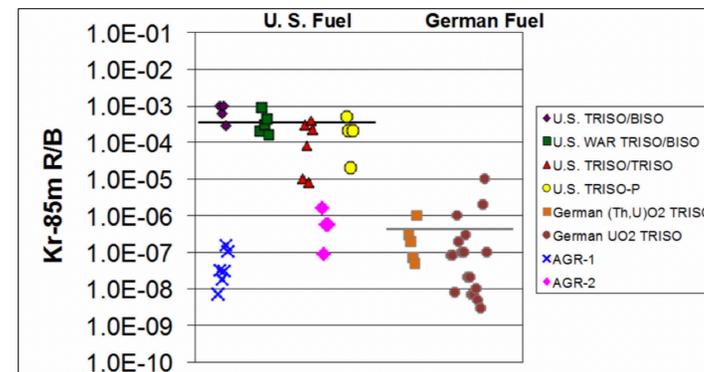
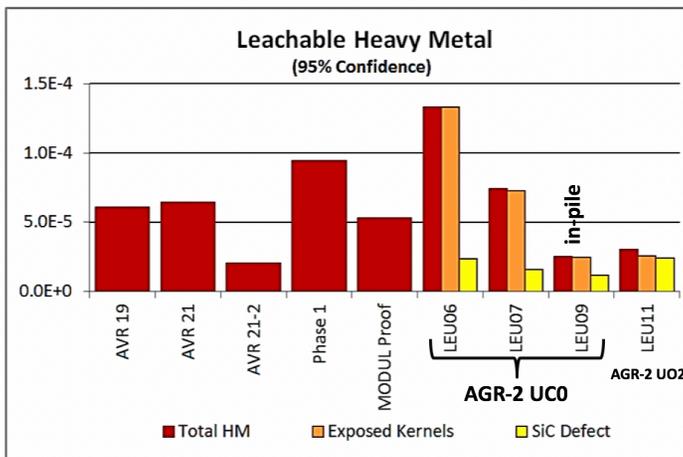
- The methodology is used to determine the probability of TRISO fuel particle failure and fission product release to support the KP-FHR source term basis
- The methodology is limited to validation of representative conditions for the KP-FHR
- Kairos Power is requesting NRC review and approval to:
 - Use the KP-BISON fuel performance analysis methodology and uncertainty quantification methodology for conducting fuel performance analysis for a KP-FHR to support the KP-FHR safety analysis.

Fuel Performance Methodology

- Fuel performance is the ability of nuclear fuel to sustain irradiation damage while retaining the integrity of the fuel's physical barriers to fission product release.
- KP-BISON is an analytical model, based on the INL BISON code, that uses constitutive equations and analytical relationships developed from experimental data to assess the probability of failure for the particle coating layers, and the potential release of fission products.
- KP-BISON is used to predict the performance behavior of TRISO fuel under KP-FHR normal operating conditions and postulated events.
- The Kairos' fuel performance methodology is based on the KP-FHR fuel design and includes a consideration of fuel performance uncertainties to calculate probability of failure and fission product release to inform the fuel contribution to the source term.

AGR Irradiation Data Informs Fuel Performance Model

- KP-BISON is validated through use of historical irradiation data, especially from the AGR-1 and AGR-2 manufacturing and irradiation campaigns and topical report from EPRI.
- Model development received a **DOE iFOA licensing award** in 2019 to accelerate the KP-BISON licensing pathway through the DOE NEAMS program in collaboration with INL and LANL



D.A. Petti et al., *A Summary of the Results from the DOE Advanced Gas Reactor (AGR) Fuel Development and Qualification Program*, INL/EXT-16-40784