

PUBLIC SUBMISSION

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10 CFR Part 53: Risk-Informed, Technology-Inclusive Regulatory Framework for Advanced Reactors

Comment On: NRC-2019-0062-0012

Preliminary Proposed Rule Language: Risk-Informed, Technology-Inclusive Regulatory Framework for Advanced Reactors

Document: NRC-2019-0062-DRAFT-0202

Comment on FR Doc # 2020-24387

Submitter Information

Email: m.keller@hybridpwr.com

Organization: Hybrid Power Technologies LLC

General Comment

Attached is a letter offering observations for going forward with the 10CFR53 development effort.

Attachments

Hybrid Pwr to NRC ltr Nov 30 2021 re Going Forward

Michael F. Keller
President
Hybrid Power Technologies LLC



November 30, 2021
10CFR53: Going Forward

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

Subject: Hybrid Power Technologies LLC Input on the NRC Rulemaking Plan on, Risk-Informed, Technology-Inclusive Regulatory Framework; Proposed 10CFR53.

Mr. Tappert:

The NRC announced via a November 30, 2021 public e-mail that the NRC Commissioners have recently granted a 9-month schedule extension for the proposed Part 53 rule making effort.

We offer the following observations:

A. Incremental improvements are always much easier to accomplish than wholesale restructuring efforts because the areas subject to comment/review only involve updated material. Along those lines, the basic structure and fundamental content of the existing 10CFR50 are readily adapted to implement the REF. (1) law that serves as the basis for the 10CFR53 rulemaking.

B. The applicant is responsible for proving to the NRC staff's satisfaction that the advanced reactor complies with the Code of Federal Regulations. The NRC staff should avoid imposing on the applicant the staff's inclinations for specific design, construction, and operational attributes.

In the interests of full transparency, we recommend that the finalized issue of 10CFR53 submitted to the NRC Commissioners be accompanied by a full compendium consisting of (1) public/stakeholder comments, concerns, and suggestions developed for the year 2022 working version of 10CFR53, and (2) NRC staff dispositions of the public/stakeholder inputs. We are of the opinion that such an effort will not be that difficult to accomplish as (1) the effort is spiraling in on an end product, and (2) all parties share a common goal of insuring that advanced reactors properly protect the public.

Kind Regards,

Michael F Keller

Michael F. Keller Professional Engineer – State of Kansas
President
Hybrid Power Technologies LLC

References:

- (1) Nuclear Energy and Modernization Act, S512 enacted into law.