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Docket: NRC-2021-0193
Kairos Power, LLC

Comment On: NRC-2021-0193-0003
Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement; Kairos Energy, LLC, Kairos Test Reactor

Document: NRC-2021-0193-DRAFT-0001
Comment on FR Doc # 2022-03537

Submitter Information

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General Comment

Good afternoon,
See attached file, "FINAL_Docket ID NRC-2021-0193_ClearPath Support Letter_Kairos Hermes EIS," for ClearPath's comment on Docket ID NRC-2021-0193.
Thank you, NatalieH

Attachments

FINAL_Docket ID NRC-2021-0193_ClearPath Support Letter_Kairos Hermes EIS

CLEARPATH



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April 11, 2022

Kenneth Erwin
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: ClearPath Comments on “Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement; Kairos Energy, LLC, Kairos Test Reactor” [Docket ID NRC-2021-0193]

Dear U.S. Nuclear Regulatory Commission Staff:

ClearPath is grateful for the opportunity to express our support for the construction of the Kairos’ test reactor, Hermes, at the East Tennessee Technology Park Heritage Center site in Oak Ridge. The Hermes test reactor will support the development and licensing of a larger, commercial nuclear power plant.

The rapid scaling of innovative technologies is necessary to mitigate climate change, and nuclear energy is essential for a reliable and robust clean-energy system. Advanced nuclear reactors have a variety of attributes that allow them to tackle power sector decarbonization at grid-scale and microgrid-scale as well as industrial and district heating. While environmental reviews are typically associated with the potential for negative environmental impacts, the positive environmental impact of advanced nuclear reactors extends further than the fence line. While every new power facility of any type will have direct land-use impacts, advanced nuclear energy has a meager impact; especially when considering avoided emissions and avoided land use of alternative energy sources.

The Hermes test reactor is significantly smaller than traditional large light-water reactors, has a power rating of 35 MWth, and does not intend to produce electricity. We would like to encourage the NRC to keep the scope of the environmental review as targeted as reasonably achievable while still obtaining reasonable assurance of adequate protection for the health and safety of the public and to protect the environment. In order to realize a reliable, multi-sectoral clean-energy future, advanced reactors will need to be constructed both *safely* and *expeditiously*.

The scoping process for the Hermes EIS is important because, although Hermes is a test reactor, elements of the Hermes’ EIS process can likely also be used for full-scale, Kairos reactor deployments. Furthermore, as the Hermes test reactor will be one of the first advanced

reactor designs to undergo an environmental review by the NRC, applying lessons learned will be useful as the NRC prepares to license multiple advanced reactor designs in the near future.

Thank you for the opportunity to provide a response. Please do not hesitate to reach out to me if you need additional information or have any questions.

Sincerely,

Natalie Houghtalen
Policy Analyst
ClearPath