

From: Alan Ahn <aahn@thirdway.org>
Sent: Monday, April 18, 2022 10:46 PM
To: KairosHermes-CPEIS Resource
Cc: Josh Freed; Lindsey Walter; Ryan Norman
Subject: [External_Sender] Comment Submission from Third Way: Docket ID NRC-2021-0193
Attachments: Third Way Comment Submission - Docket ID NRC-2021-0193.pdf

Dear Mr. Erwin:

Please see the attached written comment from Third Way in response to the U.S. Nuclear Regulatory Commission's scoping process to gather information necessary to prepare an environmental impact statement (EIS) to evaluate the environmental impacts for a construction permit (CP) requested by Kairos Power (Docket ID NRC-2021-0193).

We appreciate the opportunity to comment on this important issue. Please contact us if you have any questions or require clarification on any matters addressed in this comment.

Sincerely,
Alan Ahn

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THIRD WAY

April 18, 2022

Regulations.gov Docket ID: NRC-2021-0193
NRC Licensing Docket No. 50-7513

Office of Administration
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Program Management, Announcements and Editing Staff
Submitted via KairosHermes-CPEIS@nrc.gov

Subject: Comment from Third Way on the U.S. Nuclear Regulatory Commission's Scoping of Hermes Environmental Impact Statement (Docket ID NRC-NRC-2021-0193)

Dear Mr. Kenneth T. Erwin:

The following is a written comment from Third Way's Climate and Energy Program on environmental issues related to Kairos Power's construction permit application for its Hermes low-power demonstration reactor in Oak Ridge, Tennessee. Third Way is a national think tank based in Washington, DC that champions center-left ideas and policies. The Climate and Energy Program at Third Way designs and advocates for policies with the aim of enabling the U.S. and the rest of the world to achieve the fastest and fairest path to net-zero emissions.

Consistent with the views of a growing number of prominent experts within the climate science community and the current executive administration, we believe that nuclear energy will play an essential role in meeting global climate objectives—given the vast amounts of low-carbon energy sources that will need to be deployed in order to meaningfully reduce greenhouse gas emissions within a very short timeframe. In particular, we believe advanced reactor technologies, such as Kairos Power's fluoride salt-cooled high temperature reactor, have the potential to be rapidly deployed at scale and provide the abundant safe, clean, and reliable energy needed to combat climate change—not just power, but also industrial heat, desalination, etc.

Innovative advanced reactor designs, such as the scaled Hermes reactor, benefit from a legacy of technological breakthroughs and adaptations centered around safety and efficiency. The Kairos Power demonstration represents a new generation of nuclear reactors that are safer, more economical, and have even lower adverse environmental impact than their predecessors (which already have overwhelmingly positive environmental impact). These novel advanced reactor technologies possess inherent attributes that make their energy systems more resilient to hypothetical accidents and external hazards than ever before.

The reality is that the United States simply won't meet its climate commitments without an expansion of nuclear generation capacity. Furthermore, in the opposite scenario of contraction in nuclear capacity, authoritative analyses have shown that the output is overwhelmingly replaced by fossil fuel generation which contravenes efforts to reach climate commitments and adds to harsh climate impacts. While no energy generation is completely free of environmental impacts, nuclear power deployment has significant environmental benefits. Nuclear power generation is free of carbon and other greenhouse gas emissions that drive climate change and curbs the overall growth of these hazardous fossil fuel emissions that present direct health risks for local communities.

Therefore, we urge the NRC to implement a comprehensive view of nuclear energy's environmental implications in developing its environmental assessment process by taking into account nuclear energy's contribution to reducing climate and non-climate emissions. Further, we advise that the NRC apply this perspective in its review of the environmental impact statement for Kairos Power's Hermes demonstration reactor, as well as keeping its environmental review as efficient as possible by keeping the scope of the review focused.

Sincerely,

A handwritten signature in black ink that reads "Josh Freed". The signature is stylized with a large, sweeping underline that loops back under the first part of the name.

Josh Freed
Senior Vice President
Climate and Energy Program
Third Way

Alan Ahn
Senior Resident Fellow
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