

Speiser, Herald

From: Anonymous Anonymous <nei.nrc20190062@gmail.com>
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To: RulemakingComments Resource
Subject: [External_Sender] Public Comments on 10 CFR Part 53 - Re: NRC-2019-0062

As likely one of the few individuals still working that was involved in the testing and startup of two new power reactors, I feel the proposed rule ignores the harsh reality that reactors are highly complex machines. Experience has shown that even small incremental changes from previous designs involve many unknown-unknowns and, therefore, the use of PRA is not sufficient to ensure safety.

The proposed rule overly relies upon computational PRA methods rather than the founding principles of defense-in-depth afforded by rules like 10 CFR 50.67 and 10 CFR 100 to ensure safety. Consistent with Mr. Ernie Kee's comments on NRC-2019-062 the proposed rule ignores the dangers of these unknown-unknowns. It is especially important when regulating safety features of these immature nuclear technologies that we take a more conservative and tested approach such as using defensive-in-depth, rather than PRA, until the proposed designs become mature and well understood. Therefore, I recommend that the mitigating systems be designed using deterministic methods such as those utilized in 10 CFR 50.67 and 10 CFR 100 rather than those proposed that rely upon PRA (which cannot possibly be reliable because of the uncertainty involved in these immature and untested designs).

Lastly, we agree with Mr. Ernie Kee's comments on NRC-2019-062 regarding siting requirements. The control room, and offsite dose limits should be lowered from those in the 10 CFR 50.67 and 10 CFR 100 regulations, if these designs are to truly be reflective of safer "advanced designs." It is recommended that the dose acceptance criteria be 1/10 of the current values in the regulations for the EPZ, LPZ and control room