

U.S. Nuclear Regulatory Commission Mr. Bernard White, Senior Project Manager Storage and Transportation Licensing Branch Division of Fuel Management Office of Nuclear Material Safety and Safeguards 11555 Rockville Pike One White Flint North Rockville MD 20852

Dear Mr. White

Pacific Northwest National Laboratory (PNNL) has been developing a Transportation Framework for Micro-Reactors on behalf of the Director, Strategic Capabilities Office (SCO) for some time. In furtherance of that work, SCO and PNNL held public meetings with the full Advisory Committee on Reactor Safeguards (ACRS), on November 17 and December 6, 2023.

In my introductory remarks at both of those meetings, I emphasized SCO's goal in this work with PNNL and NRC is to create a practical pathway toward NRC approval of public road transport of a wide range of follow-on nuclear reactors. The Project Pele programmatic plan has been to fuel, operate, and transport the Pele prototype reactor at the Idaho National Laboratory (INL). As outlined in the project's Environmental Impact Statement and the SCO Director's Record of Decision<sup>1</sup>, there are no Department of Defense (DoD) plans for the Pele prototype reactor to move from the INL site.

As part of its work breakdown structure (WBS) for Project Pele, BWX Technologies Inc. (BWXT), the prime awardee for DoD's prototype design and construction work, was tasked with doing some initial work with NRC toward over-the-road transport off the INL site. BWXT performed this preliminary analysis to buy down schedule risk for future transport after the Pele reactor is operated. Recently, I requested BWXT redirect its focus on the near-term goal of building and operating the Pele prototype reactor. This led to a modification of the BWXT WBS which resulted in a pause in the supporting collaboration with NRC.

There has been no shift in the main thrust of SCO's collaboration with PNNL and NRC on the Transportation Framework for Micro-Reactors. It has always been foreseeable that the next micro-reactor to follow the Pele prototype would be a different design. What is most important is creating a broad framework to allow any future commercial or military micro-reactor a clear pathway to regulatory approval. As such, SCO still seeks an NRC letter endorsing use of the risk-informed methodology developed by PNNL.

<sup>&</sup>lt;sup>1</sup> Notice of Availability published in the Federal Register, 87 Fed. Reg. 22,521 (April 15, 2022)

Please let me know if you have any additional questions or would like to arrange for a deeper discussion on this matter. As always, I am very appreciative of the positive and productive working relationship that SCO has had with the NRC during this work and with Project Pele in general.

Jeff Waksman, Ph.D. Program Manager, Project Pele