PUBLIC SUBMISSION

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Level 3 Probabilistic Risk Assessment Project Documentation (Volume 5)

Comment On: NRC-2025-0775-0001
Level 3 Probabilistic Risk Assessment Project Documentation (Volume 5)

Document: NRC-2025-0775-DRAFT-0001
Comment on FR Doc # 2025-16769

Submitter Information

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General Comment

Attached are NuScale Power's Comments on Draft Report “Level 3 Probabilistic Risk Assessment (PRA), Volume 5: Overview of Reactor, Low-Power and Shutdown, Level 1, 2, and 3 PRAs for Internal Events.” Docket No. NRC–2025–0775

Attachments

LO-189341_final

October 29, 2025

Docket No. NRC-2025-0775

Office of Administration
Mail Stop: TWFN–7–A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555–0001
ATTN: Program Management, Announcements and Editing Staff.

SUBJECT: Submission of Comments on Draft Report “Level 3 Probabilistic Risk Assessment (PRA), Volume 5: Overview of Reactor, Low-Power and Shutdown, Level 1, 2, and 3 PRAs for Internal Events.” Docket No. NRC–2025–0775

REFERENCES:
1. U.S. Nuclear Regulatory Commission, "Level 3 Probabilistic Risk Assessment Project Documentation (Volume 5)," Federal Register Vol. 90, No. 167, September 2, 2025, pp. 42451-42453.

In a Federal Register Notice dated September 2, 2025 (Reference 1), the U.S. Nuclear Regulatory Commission (NRC) issued for public comment draft report “Level 3 Probabilistic Risk Assessment (PRA), Volume 5: Overview of Reactor, Low-Power and Shutdown, Level 1, 2, and 3 PRAs for Internal Events.”

The attachment to this letter provides comments on behalf of NuScale Power.

Please feel free to contact Amanda Bode at (541) 452-7971 or at abode@nuscalepower.com if you have any questions.

Sincerely,

Mark W. Shaver

Mark Shaver
Director, Regulatory Affairs
NuScale Power, LLC

Attachment: NuScale Comments and Review of U.S. Nuclear Regulatory Commission Level 3 PRA Project ‘‘Volume 5: Overview of Reactor, Low-Power and Shutdown, Level 1, 2, and 3 PRAs for Internal Events” (Docket No. NRC–2025–0775)

NuScale Nonproprietary

NuScale Comments and Review of U.S. Nuclear Regulatory Commission Level 3 PRA Project ‘‘Volume 5: Overview of Reactor, Low-Power and Shutdown, Level 1, 2, and 3 PRAs for Internal Events”			
Comment #	Document and Section	Comments/Basis	Recommendation
1.	Vol. 5, Section 3.3.2, page 3-36.	The 4th paragraph describes a large reduction in risk for an alternative termination time of 51 hours. Is the reduction due to the simulation being terminated early – before containment failure, which is predicted at 60 hours?	Clarify the alternative termination time and possible release.