

**SUSAN PERKINS-GREW**

*Senior Director, Emergency Preparedness  
and Risk Assessment*

1201 F Street, NW, Suite 1100  
Washington, DC 20004  
P: 202.739.8016  
spg@nei.org  
nei.org



July 8, 2015

Mr. Robert J. Lewis  
Division Director, Division of Preparedness and Response  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Proposed Emergency Preparedness Regulations and Guidance for Small Modular Reactor Facilities

**Project Number: 689**

Dear Mr. Lewis:

The Nuclear Energy Institute (NEI)<sup>1</sup> and the nuclear power industry agree with the NRC staff's recent recommendation to the Commissioners to revise emergency preparedness (EP) regulations and guidance for Small Modular Reactor (SMR) facilities.<sup>2</sup> In support of this goal, attached is an NEI white paper entitled "Proposed Emergency Preparedness Regulations and Guidance for Small Modular Reactor Facilities." As stated in the industry's presentation during an NRC public meeting on December 17, 2014, we believe this white paper can constructively inform the staff's deliberations concerning the development of an SMR EP framework, and serve as a basis for future public meeting engagement.

It is currently anticipated that the NRC staff will receive the first application associated with an SMR facility in early 2016. The applicant is expected to seek approval for an Early Site Permit (ESP). In support of its request, the applicant will likely include two proposed emergency plans for staff review—one with a plume exposure pathway EPZ boundary at two miles and the other with a plume exposure pathway EPZ encompassing only the Owner Controlled Area (i.e., a site-boundary EPZ). Both plans will reflect many of the elements contained in the attached white paper.

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

<sup>2</sup> Option 1 in SECY-15-0077, Options for Emergency Preparedness for Small Modular Reactors and Other New Technologies.

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In addition to the ESP application, it is expected that the first vendor application for certification of an SMR design will be submitted in late 2016 and followed by the first combined license application for an SMR facility in late 2017.

We look forward to meeting with the staff to discuss the attached white paper and establish a path forward for an evaluation of the proposed changes.

Questions concerning the white paper should be directed to David Young (202-739-8127; dly@nei.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Perkins-Grew".

Susan Perkins-Grew

Attachment

c: Mr. Michael Mayfield, NRO/DARR, NRC  
Mr. Mark Tonacci, NRO/DARR/SMRLB, NRC  
Ms. Anna Bradford, NRO/DARR/ARPB, NRC  
Ms. Patricia Milligan, NSIR/DPR, NRC  
Ms. Alison Rivera, NSIR/DPR/NRLB, NRC  
Mr. Andrew Mitchell, THD, FEMA  
Mr. Tim Greten, THD, FEMA  
Mr. William Eberst, THD, FEMA  
NRC Document Control Desk