

August 17, 2018

Mr. Derek Widmayer, NRC/ACRS
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft Proposed Rule for EP for SMRs and ONTs

Dear Mr. Widmayer,

TerraPower LLC is pleased to provide comments to the Advisory Committee on Reactor Safeguards (ACRS) in support of the Draft Proposed Rule, "*Emergency Preparedness for Small Modular Reactors and Other New Technologies*." TerraPower is developing multiple advanced reactor technologies. We support the Draft Proposed Rule and encourage NRC Commissioners to approve publication in the Federal Register of the proposed rule and draft guidance related to amending regulations for emergency preparedness for small modular reactors and other new technologies.

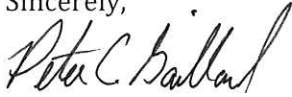
Existing regulations impose unnecessary regulatory burden and cost on applicants and licensees. This hinders development and deployment of advanced reactor technologies. Implementation of new emergency preparedness requirements as described in the proposed rule and draft guidance will increase the cost competitiveness of advanced reactor technologies by promoting the establishment of a clear, predictable and stable licensing process for advanced reactor technologies.

The new regulations will also enable advanced reactor technology developers to take advantage of technological advancements which may be used with the amended regulations and implementing guidance to further increase the cost competitiveness of advanced reactors. The level of public protection will be equivalent to that provided by existing emergency planning requirements by using the same public protection standard and EPA Protective Action Guidelines used by the current operating fleet of large light water reactors.

In addition, the international regulatory community continues to refer to NRC regulations for guidance and input when developing international regulations. If approved, the proposed changes may be reviewed and evaluated by international regulators. As a result, this rulemaking has the potential to benefit and influence international projects in addition to domestic projects.

For the reasons stated above, TerraPower supports the Draft Proposed Rule and encourages publication in the Federal Register by the NRC. Thank you for consideration of these comments. If you have any questions, please feel free to contact me at 425-324-2732 or via email at pgaillard@terrapower.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter C. Gaillard".

Peter C. Gaillard
Manager, Licensing