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General Comment

I applaud the NRC for recognizing the need to reduce the emergency planning zone requirements for the upcoming small modular reactor designs. Not only can it be demonstrated that these designs have inherent features that will prevent any significant release of radiation, but we have also seen (at the Fukushima location) radiation releases happen but which resulted in no measurable harm to people or other living things.

It is important for us to remove as many barriers as possible to the larger deployment of nuclear energy, since the primary alternative is to continue to use combustion to supply energy, which *is* dangerous, and *does* kill people, every single year, during normal operation. We must not hold nuclear technology to an unrealistic and unneeded standard of zero harm, ever. We simply need to demonstrate that it will be measurably safer than the

alternatives. 1000's of reactor-years of experience with only a single accident that hurt anyone, using designs that are inferior to current reactor models and those coming in the near future, have given us that evidence. Simply put, today's nuclear is safer than any other energy source, and we should recognize that by relaxing requirements that simply add cost and reduce likelihood of deployment.

The most dangerous nuclear plant out there is the one we don't build, because the alternatives are so dangerous. This proposed rule will help deploy these new reactors at lower cost, in more locations, and will therefore save lives by replacing combustion-based energy generation.