

PUBLIC SUBMISSION

As of: 3/24/21 4:35 PM Received: March 22, 2021 Status: Pending_Post Tracking No. kml-6fjd-r26g Comments Due: May 14, 2021 Submission Type: Web
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Docket: NRC-2009-0196

Incorporation of Lessons Learned from New Reactor Licensing Process (Parts 50 and 52 Licensing Process Alignment)

Comment On: NRC-2009-0196-0007

Alignment of Licensing Processes and Lessons Learned from New Reactor Licensing: Regulatory Basis; request for comment

Document: NRC-2009-0196-DRAFT-0009

Comment on FR Doc # 2021-01860

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General Comment

One of the key elements that the NRC should keep in mind when adjusting new reactor licensing is elimination of the use of the un-scientific Linear No Threshold Theory. This is discussed in detail in SECY-067, PR#: PRM-20-28, PRM-20-29, and PRM-20-30, FRN#: 80FR35870.

TITLE: Linear No-Threshold Model and Standards for Protection Against Radiation

These petitions are still under review and no less necessary now than they were in 2015.

Elimination of the use of the LNT (and its step-child ALARA) would greatly simplify reactor design, operational planning and emergency planning. SMRs will play a critical role in the battle against global warming and CO2 increases. Without scientifically bases for review, thier contribution will be thwarted or unnecessarily delayed, causing needless expense and the inability to address the existential energy challenges facing mankind.