

PUBLIC SUBMISSION

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Docket: NRC-2019-0062

10 CFR Part 53: Risk-Informed, Technology-Inclusive Regulatory Framework for Advanced Reactors

Comment On: NRC-2019-0062-0012

Preliminary Proposed Rule Language: Risk-Informed, Technology-Inclusive Regulatory Framework for Advanced Reactors

Document: NRC-2019-0062-DRAFT-0159

Comment on FR Doc # 2020-24387

Submitter Information

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Organization: Hybrid Power Technologies LLC

General Comment

Attached is our letter recommending a simpler 10CFR53 definition for Advanced Reactor.

Attachments

Hybrid Pwr letter to NRC Oct 5 2021

Michael F. Keller
President
Hybrid Power Technologies LLC



October 5, 2021
10CFR53: Subpart A: Advanced Reactor Definition

Mr. John Tappert
Director, Division of Rulemaking, Environmental, and Financial Support
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Hybrid Power Technologies LLC Input on the NRC Rulemaking Plan on, Risk-Informed, Technology-Inclusive Regulatory Framework; Proposed 10CFR53.

Mr. Tappert:

REF. (1) expressed concerns relative to the definition of Advanced Reactors proposed by the NRC staff for use in subpart A of 10CFR53. We are of the opinion that thrust of these concerns has considerable merit.

We recommend the use of a definition along the lines of the following:

“Advanced Reactors encompass those nuclear cores that do not employ water.”

Advanced water reactors can use either 10CFR50 or 10CFR52 while employing simplifying considerations, as sanctioned by the recently enacted **REF. (2)** law.

We remain hopeful that a proper 10CFR53 will be the end result of the ongoing development efforts.

Regards,

Michael F Keller

Michael F. Keller Professional Engineer – State of Kansas
President
Hybrid Power Technologies LLC

References:

- (1) August 5 2021 letter from Uranium Watch to NRC, Subpart A Definitions (see regulations.gov, NRC-2019-0062 comment 058)
- (2) **Nuclear Energy and Modernization Act**, S512 enacted into law.