

The logo features the word "CLEARPATH" in a bold, sans-serif font. The letters "CLEAR" are dark blue, and "PATH" is red. To the left of the text, a graphic consists of two parallel lines, one dark blue and one red, that start as a single line, then split and run diagonally down to the right, and finally merge back into a single line that continues horizontally to the right, ending in an arrowhead.

CLEARPATH

Nuclear Regulatory Commission Public Meeting on Part 53

February 8, 2022

CLEARPATH

What we do

Power



Nuclear



Storage



Natural Gas



Carbon Capture



Hydro



Geothermal

Industrial



Concrete



Metals



Hydrogen

Who we are

Mission: Develop and advance policies that accelerate breakthrough innovations that reduce emissions in the energy and industrial sectors

Policy areas

Federal R&D (basic and applied)

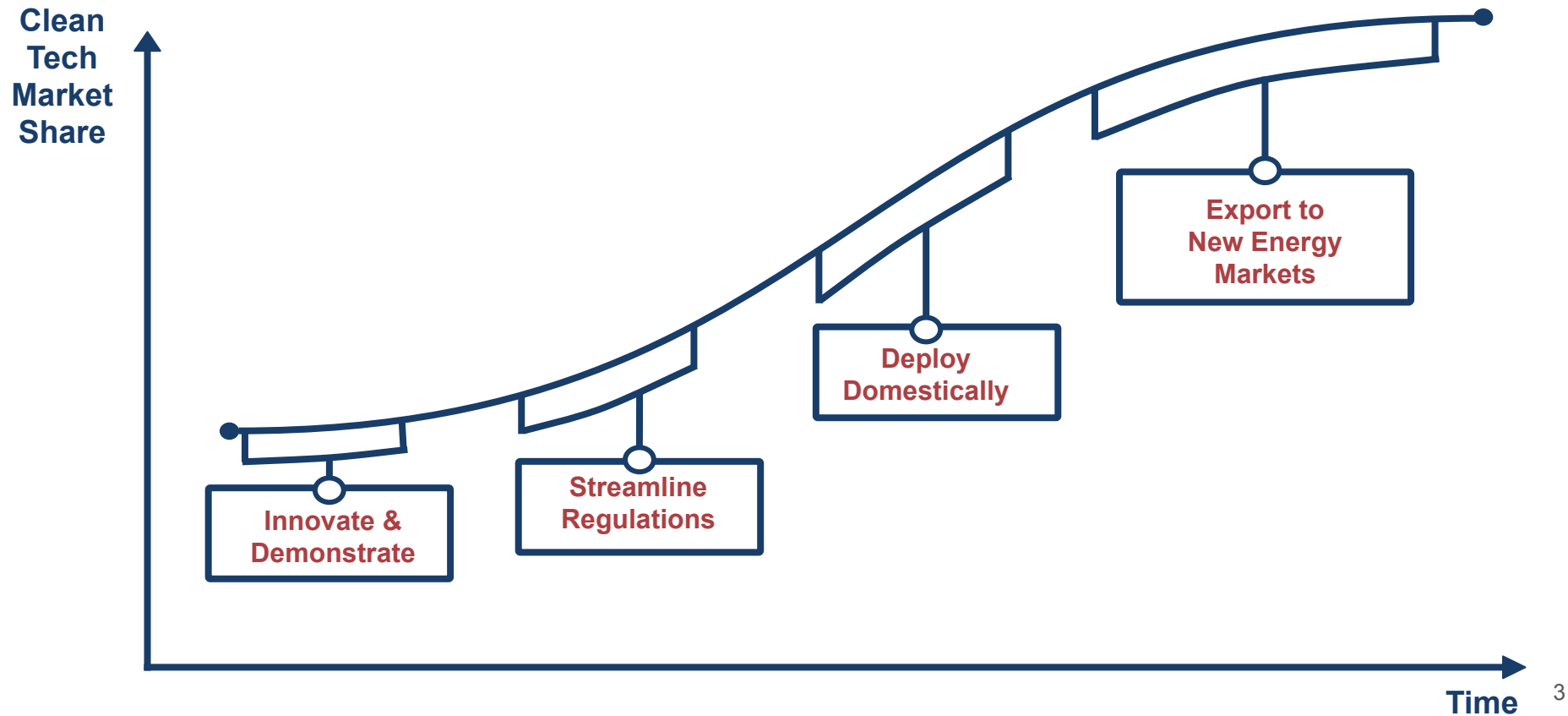
Demonstration Programs

Deployment Incentives

“Ecosystem” e.g. Regulatory Reform

Technology Export and Finance

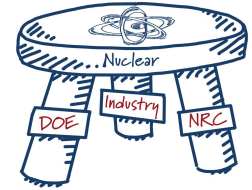
Policy should push energy technology up the “S-curve”



ClearPath Comments on Part 53 (ML21187A250)

Part 53

- Must meet the the Atomic Energy Act (AEA) and Nuclear Energy Innovation and Modernization Act (NEIMA).
- Once-in-a-generation opportunity to fundamentally reform the deployment of nuclear power in the US and abroad.
- Can be a step change in how the NRC reviews applications.



Addresses Major Topics

- QHOs, PRA, ALARA, and operational programs have all received significant stakeholder feedback
- NRC staff should ensure that the Commission is aligned

Performance Based

- If the rule is performance based, then it will be easier to be risk-informed and technology inclusive
- Build the rule around performance-based requirements

Predictable

- Need to build review predictability outside of the rule text
- Consider the role of audits, core team, guidance, etc.
- These topics can address challenges with draft language

Implementation Ready

- The NRC staff should consider “how” the rule will realistically be implemented when writing it
- A burdensome rule also impacts the NRC

Incorporates Feedback

- Revisit vision and strategy for Part 53
- Publish more text options
- Hold public meetings on specific topics (e.g. QHOs) to seek feedback to make a decision

Outstanding Questions



- 1 **Next steps:** How is the NRC best going to utilize the 9-month extension?
- 2 **Dispositioning feedback:** How can the NRC disposition stakeholder feedback?
- 3 **Safety nexus:** How does the proposed rule text support the staff's safety finding?
- 4 **Review process:** How can the licensing review itself be better implemented?
- 5 **Pilot the rule:** Can different approaches/technologies realistically use the draft text?