

# PUBLIC SUBMISSION

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Kairos Power, LLC

**Comment On:** NRC-2021-0193-0003  
Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement; Kairos Energy, LLC, Kairos Test Reactor

**Document:** NRC-2021-0193-DRAFT-0001  
Comment on FR Doc # 2022-03537

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## Submitter Information

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## General Comment


Good afternoon,  
See attached file, "FINAL\_Docket ID NRC-2021-0193\_ClearPath Support Letter\_Kairos Hermes EIS," for ClearPath's comment on Docket ID NRC-2021-0193.  
Thank you, NatalieH

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## Attachments

FINAL\_Docket ID NRC-2021-0193\_ClearPath Support Letter\_Kairos Hermes EIS

# CLEARPATH



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April 11, 2022

Kenneth Erwin  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** ClearPath Comments on “Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement; Kairos Energy, LLC, Kairos Test Reactor” [Docket ID NRC-2021-0193]

Dear U.S. Nuclear Regulatory Commission Staff:

ClearPath is grateful for the opportunity to express our support for the construction of the Kairos’ test reactor, Hermes, at the East Tennessee Technology Park Heritage Center site in Oak Ridge. The Hermes test reactor will support the development and licensing of a larger, commercial nuclear power plant.

The rapid scaling of innovative technologies is necessary to mitigate climate change, and nuclear energy is essential for a reliable and robust clean-energy system. Advanced nuclear reactors have a variety of attributes that allow them to tackle power sector decarbonization at grid-scale and microgrid-scale as well as industrial and district heating. While environmental reviews are typically associated with the potential for negative environmental impacts, the positive environmental impact of advanced nuclear reactors extends further than the fence line. While every new power facility of any type will have direct land-use impacts, advanced nuclear energy has a meager impact; especially when considering avoided emissions and avoided land use of alternative energy sources.

The Hermes test reactor is significantly smaller than traditional large light-water reactors, has a power rating of 35 MWth, and does not intend to produce electricity. We would like to encourage the NRC to keep the scope of the environmental review as targeted as reasonably achievable while still obtaining reasonable assurance of adequate protection for the health and safety of the public and to protect the environment. In order to realize a reliable, multi-sectoral clean-energy future, advanced reactors will need to be constructed both *safely* and *expeditiously*.

The scoping process for the Hermes EIS is important because, although Hermes is a test reactor, elements of the Hermes’ EIS process can likely also be used for full-scale, Kairos reactor deployments. Furthermore, as the Hermes test reactor will be one of the first advanced

reactor designs to undergo an environmental review by the NRC, applying lessons learned will be useful as the NRC prepares to license multiple advanced reactor designs in the near future.

Thank you for the opportunity to provide a response. Please do not hesitate to reach out to me if you need additional information or have any questions.

Sincerely,

Natalie Houghtalen  
Policy Analyst  
ClearPath