

From: [Chairman Resource](#)
To: [Taylor, Renee](#)
Subject: FW: Comments on 10CFR53 Update Meeting of 7-21-2022
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Sent: Tuesday, July 26, 2022 11:48 PM
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Subject: [External_Sender] Comments on 10CFR53 Update Meeting of 7-21-2022

Good morning,

This recorded meeting was not available on the US NRC website until 8 am Monday, 7-25-2022. Thus, I was not able to view it over the weekend.

Looking at a number of panel members from both panels, it would appear to me that the room air conditioner needed to be set at a lower temperature.

It is my expectation that, when the US NRC assembled light water reactor rules, probably in the mid 1970s, operating experience (for BWRs and PWRs) already existed. Today, we are trying to write rules to, more or less, predict the future since operating experience for advanced reactors does not exist. To me, this does not seem to be a reasonable goal. (This was also mentioned at 1:27:16.) What I think should be done is to copy the method the FAA used with the Boeing 737 Max: work cooperatively together so that the best current, (state-of-the-art), knowledge is being used in regulation. (I know the FAA had a couple of bad experiences with this method, partly due to lying by some participants, but I don't see how you will get access to the very latest technical knowledge any other way.)

Is the use of PRA today consistent across the fleet? If not, the Framework "A" method will significantly vary in worth.

While employed in the operating part of the nuclear industry, I qualified as a Shift Technical Advisor and I also earned a full, (unrestricted), Senior Reactor Operator license. (Incidentally, you didn't get one of them in those days unless you passed all the tests for a Reactor Operator first.) So let me say a few things about "staffing". Your eyes are misdirected. From my extensive reading of the submitted papers for the Aurora advanced reactor, they only plan to have two people at the plant most of the time. These people will not be licensed: their main function would be to trip the plant by pushing a button or throwing a switch when directed. They will not start up the plant: that will be done remotely. You have missed that management of the reactor will be done from some remote location. Consequently, you need to examine who will be making plant operating decisions AND how they plan to run the plant. Also, it will be a matter of great importance to determine if safe communication can be assured between the "home office" and any "little," advanced nuclear source of energy. If there are only two people there, who does the "behavioral observation". What about such efforts for the people who will actually start up the plant (at the home office or, even working from home)? And, don't you think that "self-disclosure" of legal actions is doomed to failure?

You know, when my father-in-law started up Nine Mile One at the end of the 1960s, the federal government said: "don't worry about the used nuclear fuel, we will take it." And when I was assigned to an operating shift at Nine Mile One at the start of the 1980s, the federal government said: "don't worry about the used nuclear fuel, we will take it." Shouldn't part of a rule for advanced reactors ask for a little information about what is going to happen with the used nuclear fuel, since we know that the federal government is no longer making that promise?

I also don't accept that 100 meters is all you have to worry about. Suppose these advanced plants get bigger? Will that 100 meters get bigger or, just like with the light water reactors over time, the boundary stays the same even though the plants get bigger and bigger. Or, how about if they just put together 10 or 12 of them as a start? Is 100 meters a constant?

Thank you,

Tom Gurdziel
Member, ASME

(I also have power plant construction experience: fossil-oil, nuclear-PWR,
nuclear-BWR.)