

# PUBLIC SUBMISSION

<b>As of:</b> 8/24/22, 1:40 PM <b>Received:</b> August 23, 2022 <b>Status:</b> Pending_Post <b>Tracking No.</b> 176-s3h8-51ty <b>Comments Due:</b> November 05, 2021 Late comments are accepted <b>Submission Type:</b> Web
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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-0270

Comment on FR Doc # 2020-24387

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## Submitter Information

**Email:** M.KELLER@HYBRIDPWR.COM

**Organization:** Hybrid Power Technologies L.L.C.

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## General Comment

As detailed in the attached letter, the NRC needs to revise the current public comment deadline of August 31, 2022. The proposed rule material provided to the public this summer is clearly a work-in-progress. A notice needs to be posted in the Federal Register.

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## Attachments

Hybrid Pwr to NRC ltr Aug 23 2022 re Schedule

Michael F. Keller  
President  
Hybrid Power Technologies LLC



August 23, 2022  
10CFR53: Revised Comment Submittal Date

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:

Federal Register Volume 86, Number 235 dated Friday December 10, 2021 revised the date for comments on the proposed rule to August 31, 2022.

The proposed rule sections provided to the public this summer are clearly a work-in-progress, with the newer sections obviously still under development by the NRC staff. Numerous parties have publically stated additional time is required to develop comments.

The NRC needs to issue a notification in the Federal Register to move the comment submittal date.

As we have previously advised in earlier correspondence, we consider that the currently proposed rule flatly fails to comply with the Nuclear Modernization Act passed by Congress. The rule needs to be significantly simplified to provide key considerations, as opposed to painfully prescriptive details. We are of the firm opinion that the existing 10CFR50/52 are easily modified to reflect such a broader type of rule that readily meets Congress's clear intent to modernize (as in simplify) the regulations for advanced reactors.

Regards,

*Michael F Keller*

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

**References:**

- (1) Nuclear Energy and Modernization Act, S512 enacted into law.