

CLEARPATH



LETTER OF SUPPORT FOR NUSCALE IMPLEMENTATION OF MODERNIZED EMERGENCY PLANNING ZONE REQUIREMENTS

ClearPath supports NuScale’s approach to develop an Emergency Planning Zone (EPZ) based on the specific safety characteristics of its reactor design. Recently, the Nuclear Regulatory Commission (NRC) approved Tennessee Valley Authority’s Early Site Permit (ESP) at Clinch River. The ESP contained a different EPZ sizing methodology that credited a small modular reactor’s improved safety features. Building on the ESP, the NRC is also moving forward with a rulemaking that would allow this process to be used by other reactors.

NuScale, as the first small modular reactor to begin NRC licensing, is paving the way for how to implement the methodologies approved in the Clinch River ESP and in the ongoing rulemaking. This proposal establishes an important template for how an actual reactor design can seek approval from the NRC for an appropriately sized EPZ.

However, while this review will set a precedent for future applications, the NRC should ensure that future reviews are performance-based and consider the merits of a future reactor’s own unique design features. Furthermore, other reactor designs may use different methods than NuScale, and the NRC should be open to other proposals. This aligns with the NRC’s commitment to become a modern regulator that leverages opportunities for applicants to use new technologies to achieve both safety and security.

Jeremy Harrell
Managing Director, Policy
ClearPath