POLICY ISSUE
NOTATION VOTE

RESPONSE SHEET

TO: Annette L. Vietti-Cook, Secretary

FROM: CHAIRMAN SVINICKI

SUBJECT: SECY-19-0117: Technology-Inclusive, Risk-Informed, and Performance-Based Methodology to Inform the Licensing Basis and Content of Applications for Licenses, Certifications, and Approvals for Non-Light-Water Reactors

Approved XX **Disapproved** ____ **Abstain** ____ **Not Participating** ____

COMMENTS: **Below** XX **Attached** ____ **None** ____

I find that it is reasonable for the staff to use the technology-inclusive, risk-informed, and performance-based methodology described in this paper - and I approve its use - to inform the licensing basis and agency requirements for the content of applications for licenses, certifications, and approvals for non-light-water reactors. I agree with the observation of the Advisory Committee on Reactor Safeguards, made in their letter report dated March 19, 2019, that the paper "proposes the next evolution of a licensing approach that has been developed over the past thirty years." The next phase of this evolution – and perhaps the most profound – will now begin with the stylized application of this approach and its attendant methodology to the review of those advanced reactor applications now in house and to be received in the coming years, from which numerous and diverse experiential learnings will arise.

The NRC needs to remain open to continuous, critical examination of its thinking regarding approaches and metrics for the licensing of this coming class of advanced reactors. While the approach here proposes to treat the Commission's established policy on the application of the safety goals and safety performance expectations as providing an adequate minimum standard for new reactors, there are many aspects of our current regulatory framework for reactors that would have the effect of acknowledging and maintaining the significantly lower risks expected to be presented by advanced reactors. For example, a licensee of such a reactor would be bound by its license and technical specifications, which would appropriately reflect such lower risks. The staff should consider how to adapt those portions of our regulations that have a similar effect (e.g., the more than minimal increases in risk test in Section 50.59, the Maintenance Rule of Section 50.65, and the quality assurance criteria of Appendix B) to the potential framework for advanced reactors in light of the potential increases in operational flexibility afforded their licenses by the lower inherent risks presented.

Kristine L. Svinicki
Digitally signed by Kristine L. Svinicki
Date: 2020.05.07 17:37:04 -04'00'

Entered in STARS
Yes__XX__
No_____

SIGNATURE

05/07/2020
DATE