

TERRAPOWER LLC FEEDBACK TO THE NRC
“VOLUNTARY REPORTING OF PLANNED NEW REACTOR APPLICATIONS”
January 27, 2021

The Nuclear Regulatory Commission (NRC) recently published a Federal Register Notice announcing their intent to submit an information collection request to the Office of Management and Budget (OMB) for “Voluntary Reporting of Planned New Reactor Applications.” Annually, the NRC issues a Regulatory Information Summary (RIS) requesting potential applicants to voluntarily submit the requested information. As a potential respondent to this information request, TerraPower LLC is providing the following feedback to the NRC.

1. Is the proposed collection of information necessary for the NRC to properly perform its functions?

TerraPower Feedback: The proposed collection of information is necessary and useful for the NRC to properly perform its functions. Providing this information assists the NRC in determining their resource and budget needs. If the NRC is able to properly plan resource and budget needs, they will be able to provide timely and efficient reviews of TerraPower submittals and support pre-application interactions.

1a. Does the information have practical utility?

TerraPower Feedback: The information has practical utility for the NRC and TerraPower. If the NRC is able to properly plan resource and budget needs, they will be able to provide timely and efficient reviews of TerraPower submittals and support pre-application interactions. For TerraPower, the proposed collection of information supports planning, schedule development and pre-application interaction planning with the NRC.

2. Is the burden estimate accurate?

TerraPower Feedback: TerraPower reviewed Table 1, *Annualized Reporting Burden* from the *draft Supporting Statement for Voluntary Reporting of Planned New Reactor Applications*. The Burden Hours per Response from Table 1 appears to be accurate.

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

TerraPower Feedback: Each potential applicant may have unique circumstances for their potential 10 CFR Part 50 and/or Part 52 licensing activities, submission dates and plans for construction and inspection activities. The RIS should encourage applicants to communicate and discuss questions with the NRC prior to submittal of their information. Early communication could enhance the quality, utility, and clarity of the information to be collected.

4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

TerraPower Feedback: There may be circumstances where a response to the request for voluntary reporting of planned new reactor applications is redundant. An example is when an applicant might instead develop and submit a Regulatory Engagement Plan or

similar document that provides essentially the same information as the proposed RIS. In circumstances such as this, the applicants should communicate to the NRC that the requested information will be provided in a separate submittal and identify the submittal to the NRC.

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