

November 6, 2023

Docket No. NRC-2023-0048

David C. Cullison
Office of the Chief Information Officer
Mail Stop: T-6 A10M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: NuScale Power, LLC Submittal of Comments on "Information Collection: Licenses, Certifications, and Approvals for Nuclear Power Plants."

REFERENCES: 1. "Information Collection: Licenses, Certifications, and Approvals for Nuclear Power Plants," 88 Fed. Reg. 61626, dated September 7, 2023

In a Federal Register Notice dated September 7, 2023 (Reference 1), the U.S. Nuclear Regulatory Commission (NRC) issued for public comment, "Information Collection: Licenses, Certifications, and Approvals for Nuclear Power Plants," requesting that comments be submitted by November 6, 2023.

The attachment to this letter provides comments on behalf of NuScale Power, LLC.

Please feel free to contact Gary Becker at 541-360-0549 or at gbecker@nuscalspower.com if you have any questions.

Sincerely,



Tom Griffith
Manager, Licensing
NuScale Power, LLC

Attachment: NuScale Comments on "Information Collection: Licenses, Certifications, and Approvals for Nuclear Power Plants."

| NuScale Power Comments U.S. Nuclear Regulatory Commission “Information Collection: Licenses, Certifications, and Approvals for Nuclear Power Plants” | | | |
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| Comment # | Section | Comments/Basis | Recommendation |
| 1. | Table 1, Annual Reporting Burden, Subpart E | The estimate for Subpart E responses (Standard Design Approvals) does not include the 1 LWR SDA application (NuScale US460) currently under review. That SDA review will continue throughout CY2024. | Based on the burden in CY2023 to-date, NuScale estimates the CY2024 burden to be 32,000 hours annually. |
| 2. | Draft supporting statement, pp. 16-17 | This information clearance is intertwined with several others. For example, the draft supporting statement notes that information collection pursuant to 10 CFR 52.77 (COLA general information and 52.80(b) (COLA environmental report) are covered under clearances 3150-0011 and 3150-0021, respectively. This approach obfuscates the information collection associated with a single licensing action, in this example the burden required to seek a COLA, and may be inaccurate due to differing renewal cycles. Notably, the current version of 3150-0011 has no estimated COLA applications, so when this approval points to 3150-0011 as covering the collection under 10 CFR 52.77, no responses and no burden are currently allocated. These COLA requirements—especially the environmental report—are a significant portion of a COLA application (and likewise for other Part 52 licensing actions. All aspects of Part 52 applications should be controlled under a single OMB clearance for clarity and accuracy. | Revise the scope of this OMB clearance to cover the complete Part 52 license application by moving the reporting burden for associated requirements from the clearances for those regulations (e.g., 3150-0011 and 3150-0021) over to OMB 3150-0151. |

| Specific information being requested by the NRC for this item: | |
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| 1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility? Please explain your answer. | See Items 3 and 4, below. |
| 2. Is the estimate of the burden of the information collection accurate? Please explain your answer. | See Comment #'s 1 and 2 above. |
| 3. Is there a way to enhance the quality, utility, and clarity of the information to be collected? | In NuScale's experience, some of the information the staff requests in SDA and DC applications is beyond the scope of information necessary for assuring public health and safety. |
| 4. How can the burden of the information collection on respondents be minimized, including the use of automated collection techniques or other forms of information technology? | The out-of-scope requests could be minimized if the staff considered risk-significance prior to requesting additional information. |