JULY 13, 2018

COMMENTS ON BEHALF OF THE
ENERGY COMMUNITIES ALLIANCE

SUBMITTED TO THE
U.S. NUCLEAR REGULATORY COMMISSION

[DOCKET No. 52–047; NRC–2016–0119]

EARLY SITE PERMIT APPLICATION:
TENNESSEE VALLEY AUTHORITY;
CLINCH RIVER NUCLEAR SITE
COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE TENNESSEE VALLEY AUTHORITY’S EARLY SITE PERMIT FOR THE CLINCH RIVER NUCLEAR SITE

Introduction

The Energy Communities Alliance (ECA) appreciates the opportunity to provide comment on the U.S. Nuclear Regulatory Commission’s (NRC) Draft Environmental Impact Statement (DEIS) (Report No. NUREG-2226) as part of the review of the application by the Tennessee Valley Authority (TVA) for an Early Site Permit (ESP) for the Clinch River Nuclear (CRN) Site in Oak Ridge, Roane County, Tennessee.

ECA is the only national, non-profit organization of local governments adjacent to or impacted by U.S. Department of Energy (DOE) activities. Our membership, consisting of elected local officials and other community leaders, has long played a key role in supporting the nation’s environmental cleanup and national security missions. Many ECA members are now exploring how best to leverage existing community assets acquired due to those missions (i.e., land, existing energy infrastructure, a skilled workforce) to support the development of advanced nuclear energy generation and manufacturing facilities, and other advanced energy technologies.

ECA believes that preparing a DEIS is a necessary step in the review of TVA’s ESP for a new nuclear power plant demonstrating small modular reactor (SMR) technology. The NRC is playing a critical role in the realization of advanced nuclear technologies’ benefits for the eastern Tennessee region and nation at large.

ECA agrees with the NRC staff’s preliminary recommendation to the Commission that the ESP should be issued based on the findings of the DEIS.

Justification

When in place, advanced nuclear technologies, such as SMRs, have the ability to scale-up regional electricity generating capacity, therefore increasing U.S. energy independence, reducing reliance on greenhouse gas-emitting energy sources, and creating economic stimulus for the region, among other benefits.

In 2014, ECA formally adopted a policy position\(^1\) supporting the development of new nuclear energy generation facilities, such as an SMR at the CRN Site. Since that time, ECA has worked with DOE and industry to develop priorities and ensure that there is a robust, local workforce within our communities, equipped with the technical and engineering competencies necessary to

\(^{1}\) Energy Communities Alliance Policy Book, Energy Communities Alliance, 2014, p. 13
support new nuclear energy missions. ECA has also been supportive of the development of public-private partnership opportunities for SMR financing and power purchase agreements.

Several ECA member communities in eastern Tennessee are already taking steps to support SMR and other advanced nuclear technology development. In May 2012, Roane County, Tennessee, unanimously passed a resolution\(^2\) supporting TVA in its SMR application to DOE. The City of Oak Ridge, Tennessee, passed one resolution\(^3\) in June 2017 in favor of the NRC’s review of TVA’s ESP, and a second resolution in July 2018 in support of the DEIS for the CRN Site.

Similarly, ECA member communities in other regions of the country have a stake in advanced nuclear projects and understanding how the NRC’s licensing process will work. Los Alamos County, New Mexico, and the City of Idaho Falls, Idaho, are both part of the Utah Associated Municipal Power System’s Carbon Free Power Project to build an NuScale Power, LLC-designed SMR at the Idaho National Laboratory near Idaho Falls. The communicates around DOE’s Hanford Site in Washington State are likewise interested, with a 2014 study by the Tri-City Development Council concluding, “siting an SMR generating station at Hanford is technically feasible and many benefits come from using the existing infrastructure, local nuclear workforce, and other regional assets.”\(^4\)

**Conclusion**

ECA applauds the NRC for its work in the preparation of the DEIS for the CRN Site. We support the NRC in a decision to issue TVA an ESP based on the findings of the DEIS. We believe that this decision will assist in the development of a strong regulatory and policy framework for siting new advanced nuclear energy generation facilities throughout the country and will lead to increased understanding of how the federal government, local governments, state and federal regulators, and industry can work together to realize the benefits of advanced nuclear technologies.

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\(^2\) Resolution #05-12-24, Roane County, TN, p. 31  
\(^3\) Resolution No 5-41-2017, City of Oak Ridge, TN  
\(^4\) *Small Modular Reactor Hanford Site Analysis Final Report*, Tri-City Development Council, September 2014, p. 5