

James Walker

First, the mixed use of metric and english measurement units in the proposed regulations is confusing. Please go with all english measurement units, and if necessary, consistently put the equivalent metric units as a parenthetical adjacent to the english measurement unit. Next it is bad form to cite to a statutory definition in a public notice of a proposed regulation that has not yet been published in the statutes. I am specifically referencing proposed 18 AAC XX.900(7) definition of "microreactor". For purposes of soliciting comments, that statutory definition should be included as a footnote so the public knows what is being proposed. As far as that definition goes, I note that the only microreactor design currently approved by the Nuclear Regulatory Commission is the NuScale Power small modular reactor (SMR) design that was originally approved at 50 MW/module, but due to efficiency gains that design is now rated at 77 MW/module. While recommending a proposed statutory change is outside of the normal scope of comments on a proposed regulation, I strongly suggest that the Department recommend such a statutory change so that there is at least one approved design that could be used in Alaska. Whereas there are few places in Alaska where a 50 MW (or a 77MW) generation unit can be cost effectively installed consistent with electric reliability standards, outside of the Railbelt grid, the more variety in generation resources available to the grid increases reliability and decreases reliance on individual monopoly fuel providers. Thank you for undertaking this task. Sincerely, James L. Walker