

EcoSMR-webinar, SMR Licensing Aspects

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of Nuclear Experts**

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20/03/2022

Sisäinen

20+ years
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600+ projects
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Industry

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1998

Mikkeli (HQ), Helsinki,
Rauma, Turku, Tampere,
Eurajoki

Miika Puukko, CEO



**Supporting Licensees and
Suppliers.**

**Participating to EcoSMR
and EcoFusion.**



Licensing, Qualification & Authority Requirements

Today

Management of Nuclear Specific Procedures
Management of Project Specific Licensing
Technical Support for Licensing & Qualification
Safety Analyses & Independent Reviews
Nuclear Specific Trainings

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Plant Safety & Optimization

Process Modelling
Plant Life Management
RadWaste Management
Radiation Safety



Equipment & System Deliveries

Design & Engineering
Process Equipment & Systems
UF₆ Solutions

Present state of legislation and development aspects in Finland 1/2

SMR = Small Modular Reactor or other 'small' nuclear reactor

- Nuclear Energy Act and Radiation Act
- Degrees by Ministry or Government
- Regulations by Finnish Nuclear Safety Authority (STUK) ~ hundreds of requirements
- YVL-Guides by STUK ~ 6 000 of requirements
 - New structure of guides under development.
 - Target to separate safety requirements and ways to fulfill them.
 - Kelpo -development work for equipment level qualification.

Present state of legislation and development aspects in Finland 2/2

SMRs are not separately recognized in regulations.

Licensing can be done by existing regulations, but development is needed.

Big NPPs: (Tens of) thousands of technical requirements to be fulfill.

SMRs: Safety performance demonstration. Very low emissions required even in the worst accident.

Development investigations of Finnish regulatory

Finnish Energy Technology Association (ET ry) ordered 2021 from Platom investigation studies:

1) Development proposals to Finnish regulation

2) New Licensing Model for SMRs

- Safety has to be ensured without tailoring the design.
- Find an ideal way to get license to built SMRs to Finland.

Over 20 experienced expert and organization was interviewed, such as:

- Ministries (STM, TEM), Authorities (STUK),
- LUT University and Research Institution (VTT)
- Licensees (TVO, Fortum, Posiva) and Fennovoima
- Energy companies

Webropol questionnaires were made, workshops kept etc.

Reports are now delivered to ET (in Finnish) but not published.

Development assessment, main questions to new licensing model

- a) How nuclear and radiation **safety** of SMR ensured?
- b) Is modernization proposal to regulation enough or too big and agile for licensing of SMRs?
- c) (How the new model could be challenged?)

Principles:

The new SMR must be profitable for its owner.

Before construction license, costs must be low.

Tailoring is not the answer.

How plant / system / equipment level shall be handled?
Risk-based approach

Challenges and topics to development 1/2

- **Who are the** licence applicants and other **actors**?
- What is needed in the **first licensing phase** (decision-in-principle phase)? **Political** and strategical decision or also plant type design, local permission?
- What is needed in the **second licensing phase** (Construction license phase)? Safety requirements, design basis and principles, **Plant Design** demonstrated? **Local permission** and **environmental impact assessment**, **approvals of actors**?
- What is needed **before operating phase**? Plant and system level safety demonstration but how deeply the **equipment level**?

Focus to the physical processes, not to the management of the processes.

Challenges and topics to development 2/2

- In **operating phase**: organization requirements, protection zones and occupation, security and supervision, maintenance? **Depends strongly which kind of SMR** is in question. **Detailed safety requirements are hard to set.**
- Main safety principles shall be connected to risk of radioactive discharge.
- Who decides when **SMR is to be closed**? Who is responsible of decommissioning? Where is the spent fuel disposal site?
- Authority or regulation shall not define the design of the nuclear plant.

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(own statements)

Main Aspects to SMR licensing

- Overlaps should be eliminated,
- the timing of the delivery and content of documentation and demonstrations should be reviewed and
- the risk of licensing should be reduced and
- the requirements must be proportionate to the level of risks and
- qualification of equipment and component has to be harmonised.
- Predictability and profitability of licensing has to be improved.
- The assessment of social acceptability and the approval of the locality must be maintained.

safety performance →
small releases →
low emissions →
SMR can be **near people**.

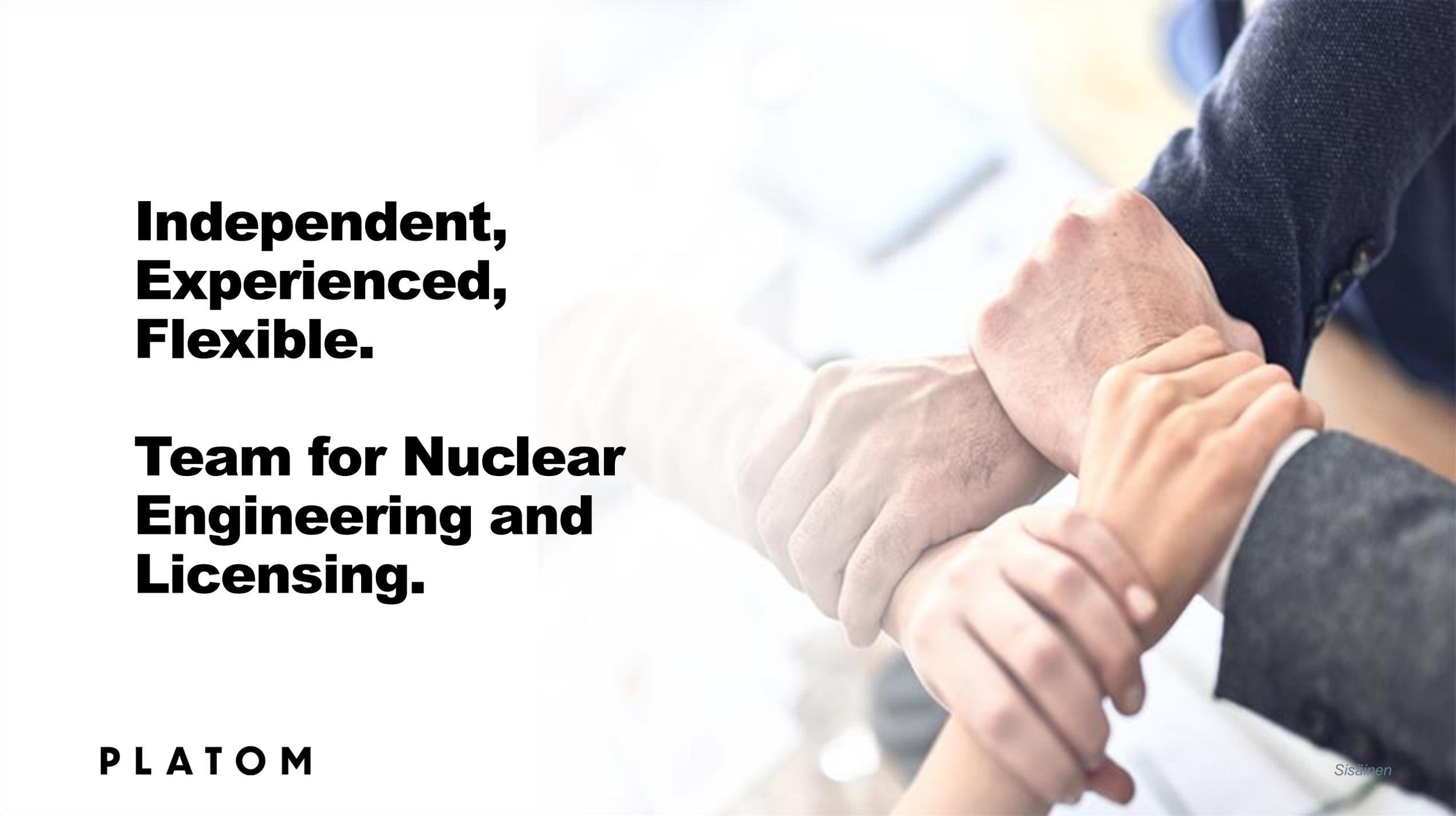
Program for licensing planning?

Platom is developing a specified **program for licensing and qualification planning**.

- Takes account first the Finnish Authority Requirements (also YVL-guides).
- For all kind of NPPs, new ones and, also for modernization projects.
- Program can recognize documentation and approvals needed in plant, system and equipment level in each phase.
- Templates could be included to results.
- Can be used also for supervision of state of approvals and tasks and when estimating costs of authority documentation

*To be taken in use at
Platom in 2023, lets see!*

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Thanks!

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