Dear Ms. Lorenz,

Please find below information concerning regulating and licensing SMRs in Finland.

Some general points:

- The current regulatory requirements are written with the mindset of regulating large LWRs that are used for electricity production. Even if licensing an SMR using LWR technology would be possible with the current requirements, the present regulations are not optimal for SMRs.
- A renewal of the legislation related to use of nuclear energy is starting. SMRs are one aspect to be considered in the renewal.
- SMR specific regulations are not planned. We prefer having goal setting and technology neutral requirements that can be applied to different reactors.
- The regulatory approach is the same for all facilities, but the approach includes applying graded approach. It means that the regulatory control and the measures to ensure safety must be commensurate with the risks of the regulated facility / activity.

For further information, STUK has published a report discussing licensing of SMRs and the preconditions for the safe use of SMRs. In it we have identified some questions that are new, different, or highlighted in licensing SMRs, compared to licensing traditional reactors. I hope it will be helpful for you.

With kind regards, Minna

\*\*\*\*\*

Minna Tuomainen Principal Advisor Nuclear Reactor Regulation STUK – Radiation and Nuclear Safety Authority P.o. Box 14 (Laippatie 4), 00881 Helsinki Tel. + 358 9 759 88 329 minna.tuomainen(at)stuk.fi http://www.stuk.fi