

Challenges in Regulation of New & Emerging Innovative Technologies



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Views expressed in this presentation are based on my experience working in this field and not to be treated as views of AERB



Outline

- Energy / Power Requirement
- Historical Development of Technology
- New & Emerging Innovative Technologies
- Expected challenges due Innovative technology
- AERB Regulatory Experience
- AERB Preparedness
- Summary

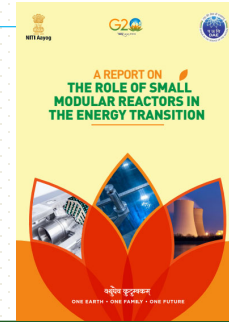


Energy / Power Requirement

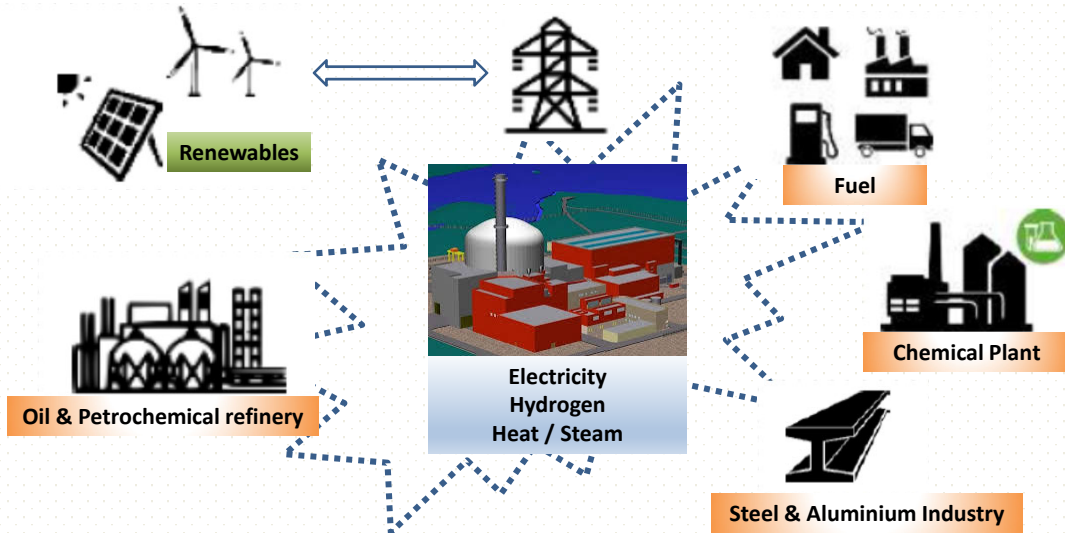
Category		Installed Generation Capacity (MW)	% Share in Total
Fossil Fuel	Coal	2,08,189	48.4%
	Lignite	6,620	1.5%
	Gas	25,038	5.8%
	Diesel	589	0.1%
	Total Fossil Fuel :	2,40,437	55.9%
Non-Fossil Fuel	RES (Incl. Hydro)	1,82,045	42.3%
	Hydro	46,928	10.9%
	Wind, Solar & Other RE	1,35,116	31.4%
	Wind	44,969	10.5%
	Solar	74,307	17.3%
	BM Power/Cogen.	10,262	2.4%
	Waste to Energy	584	0.1%
	Small Hydro Power	4,995	1.2%
	Nuclear	7,480	1.7%
	Total Non-Fossil Fuel :	1,89,525	44.1%
Total Installed Capacity (Fossil Fuel & Non-Fossil Fuel)		4,29,961	100%

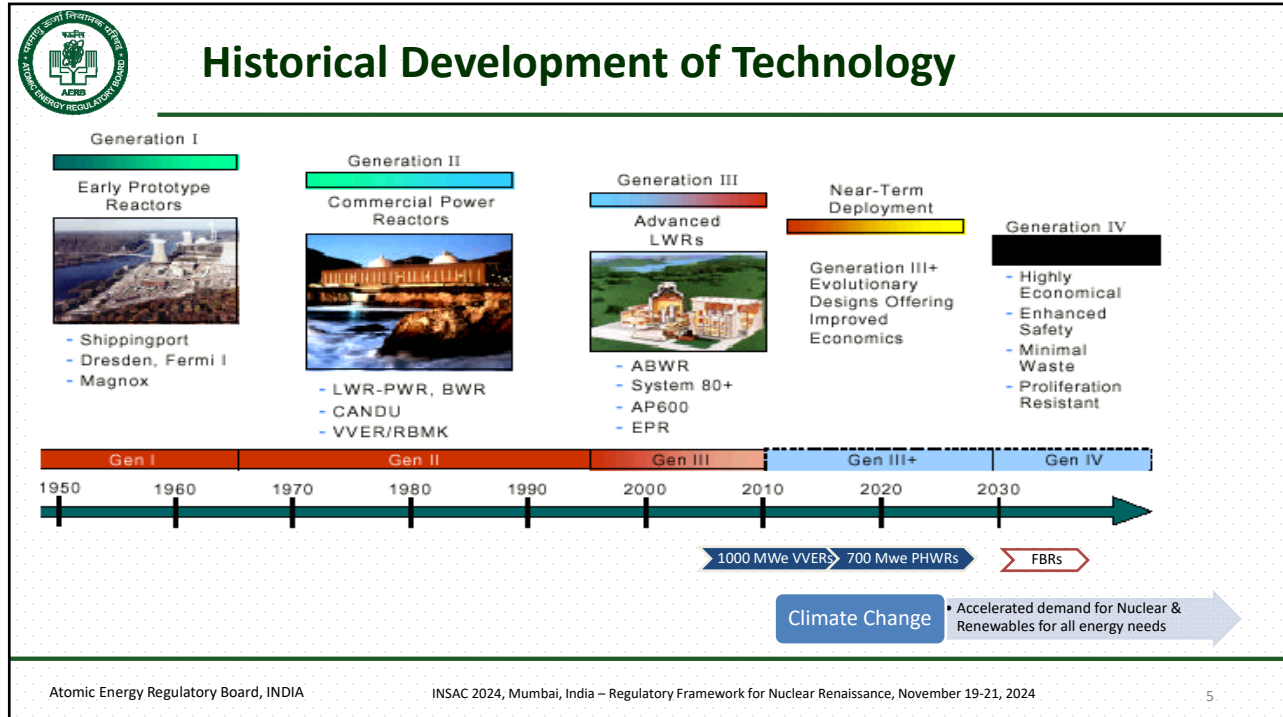
Source : Central Electricity Authority (CEA)

- Traditional use - baseload power to large power grids
- Clean Energy – Nuclear with Renewables
 - Industrial Decarbonisation: Transport & Manufacturing
 - Greater load following (to replace fossil fuels)
 - Smaller power grids (isolated/remote off-grid locations)
 - Waste minimization



Energy / Power Requirement




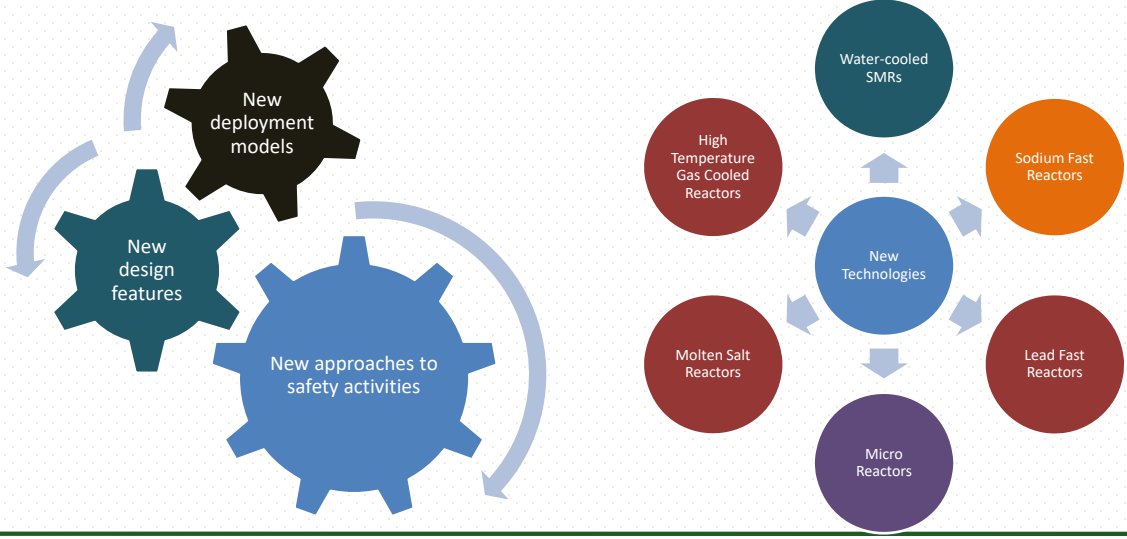


New & Emerging Innovative Technologies

- An innovation in the context of the safety assessment of NPP is considered to be a new type of SSC(s) or a specific mode of operation relevant to safety that has not previously been used or is used in a new way, for which:
 - Proven engineering practices for nuclear power plants are not fully defined; or
 - Existing practices or safety standards need to be interpreted, and judgement used for their application.
- Within this definition, innovations fall into a spectrum (degree of innovation) spanning the following three areas:
 - Minor upgrades to well-established technological solutions in nuclear power plants;
 - Evolutionary changes to existing solutions with some new characteristics;
 - Technologies with new characteristics or properties previously not used in nuclear power plants.
- A design with multiple innovations that includes conceptual changes compared to existing plants is referred to as an innovative design


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 **New & Emerging Innovative Technologies**



The diagram illustrates the components of new and emerging innovative technologies. On the left, three interlocking gears represent 'New design features', 'New deployment models', and 'New approaches to safety activities'. On the right, a central blue circle labeled 'New Technologies' is connected by arrows to five surrounding circles representing different reactor types: 'Water-cooled SMRs', 'Sodium Fast Reactors', 'Lead Fast Reactors', 'Micro Reactors', and 'High Temperature Gas Cooled Reactors'. 'Molten Salt Reactors' is also shown as a separate technology.

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 **Expected challenges due Innovative technology**

- Nuclear fuels
- Reactor coolant and working medium
- Working principles and Phenomena
- Instrumentation and control
- Approaches to reactor operation
- human-machine interfaces
- Surveillance, inspection and maintenance
- Materials
- Codes and standards
- Use of proven engineering practices in a different context
- Manufacturing and construction
- Non-electricity generation applications
- Multi-unit and multi-module designs
- Transportable concepts or siting concepts
- Computer codes

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Expected challenges due Innovative technology

• FUEL CONCEPTS

- Ex: tri-structural isotropic (TRISO) fuel, molten salts etc.
- Behavior in different plant states - fuel qualification programme
- On-site transport, handling and storage of irradiated and unirradiated fuel
- Fuel cycle back end and long term management
- Margins in safety performance, acceptance criteria and design limits

• NON-WATER REACTOR COOLANTS

- Ex: sodium, lead, lead–bismuth, molten salts etc.
- Experience with sodium as reactor coolant.
- Thermo-physical/nuclear properties – variation with time.
- Coolant parameters in different plant states - freezing etc.
- Chemistry – quality/impurities, storage & disposal etc.
- Different support system design - significant source terms, high corrosion, negligible leak requirement
- New PIEs/hazards - relocation of radioactive source
- Application of common NDTs & standards etc.



Expected challenges due Innovative technology

• INSTRUMENTATION AND CONTROL

- Digital architecture - Automation or AI
- Difficult to predict failure modes - disable operator functions, misleading indications
- Independence of defence in depth levels
- New vulnerabilities - cyber-attacks

• ADVANCED MATERIALS & MANUFACTURING

- Lack of knowledge of the relevant failure mechanisms,
- Corrosion, wear and tear, and ageing mechanisms
- No appropriate established codes or standards

• PASSIVE SAFETY FEATURES

- Generally weak driving forces - stability & failure modes.
- Scale testing and pre-operation testing.
- Reliability

• NON-ELECTRICITY GENERATION APPLICATIONS

- Ex: hydrogen production, heat generation, desalination often via co-generation
- Impact of facility on NPP and NPP on facility and accident management

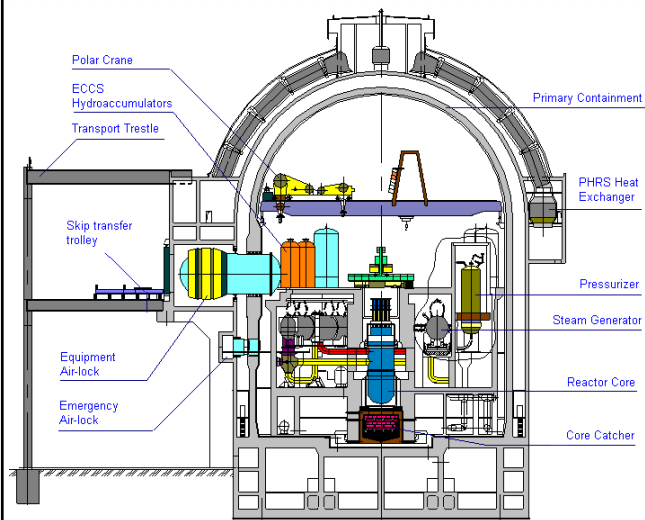


Expected challenges due Innovative technology

- **HUMAN AND ORGANIZATIONAL IMPLICATIONS**
 - Different organizational arrangements – SMRs, reduced/no staffing at site.
 - Innovative modes of operation - remote, AI & ML supported, loss of operator skill
 - Shared control room for multi modules
 - Support for maintenance & inspection
 - On-site and off-Site Accident Management
- **SAFETY ANALYSIS**
 - Validated computer codes
 - DSA: PIEs, acceptance criteria, severe accident/hazards, etc.
 - PSA: SSCs reliability data, human reliability, passive system reliability etc.
 - Unique plant operational states
 - Passive and inherent design features
- **MULTI-UNIT AND MULTI-MODULE DESIGNS**
 - Combinations of operational states and configurations
 - shared systems Impact – fault transfer, CCF
 - Human interactions and EPR
- **TRANSPORTABLE NUCLEAR POWER PLANTS**
 - Site change, potential hazards change, safety analysis change
 - Monitoring and EPR
 - Security



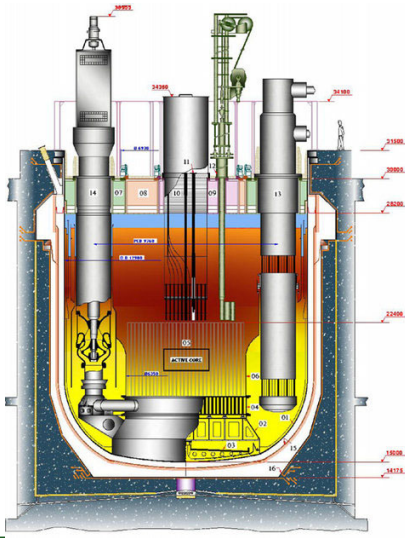
AERB Regulatory Experience – KKNPP-1&2



- Reference Plant + Many FOAK Features
- Licensable in Russia
- PSAR supported by Topical Reports (Experimental demonstration)
- AERB Codes and Guides (generic and Intent of technology specific requirement)
- IAEA, IAEA Review of VVER and International references for PWRs
- RF Regulatory Body Review Recommendations
- Licensing process and stages almost same (extended commissioning)



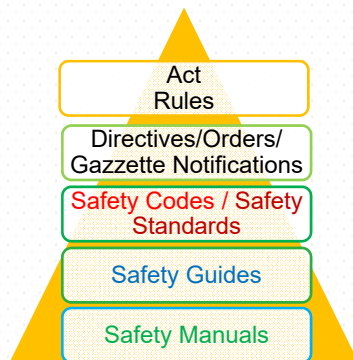
AERB Regulatory Experience – PFBR



- FBTR Experience (commissioned in 1985)
- AERB Codes and Guides (generic and Intent of technology specific requirement)
- Developed **safety criteria for the design** of PFBR and compliance of PFBR design with this document.
- PSAR supported by extensive testing and Experimentation at IGCAR – test reports
- International experience on FBRs
- Licensing process and stages almost same (extended commissioning)



AERB Preparedness - Regulatory Instrument



Regulatory Process
Radiation Protection
Emergency Preparedness
Rad. Waste Management
Industrial Safety



Siting
NPP – Design
NPP – Operation
NPP – Quality Assurance
Fuel Cycle Facilities

- Nuclear Safety Fundamentals and high level requirements remains same
- Adequate Technology Neutral Regulation to address various designs – further work in progress
- Technology specific covered for WCRs & SFRs – further optimization based on experience
- Technology specific aspects may need to be evolved based on type of technology



AERB Preparedness - Safety Review & Licensing

Repeat Design

- Previously reviewed by AERB
- Site specific modifications

Exact Replica

Additional/modified safety/design features or capacity enhanced. Review of changes

New Design

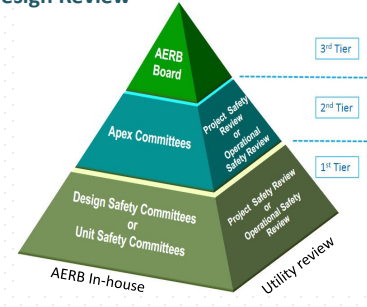
- Previously not reviewed by AERB.
- Detailed review & assessment, independent verification, regulatory R&D

Commercial design operating elsewhere - Reference Plant Design

Design not in operation at a commercial level - Prototype Design

Pre-Application Consultation

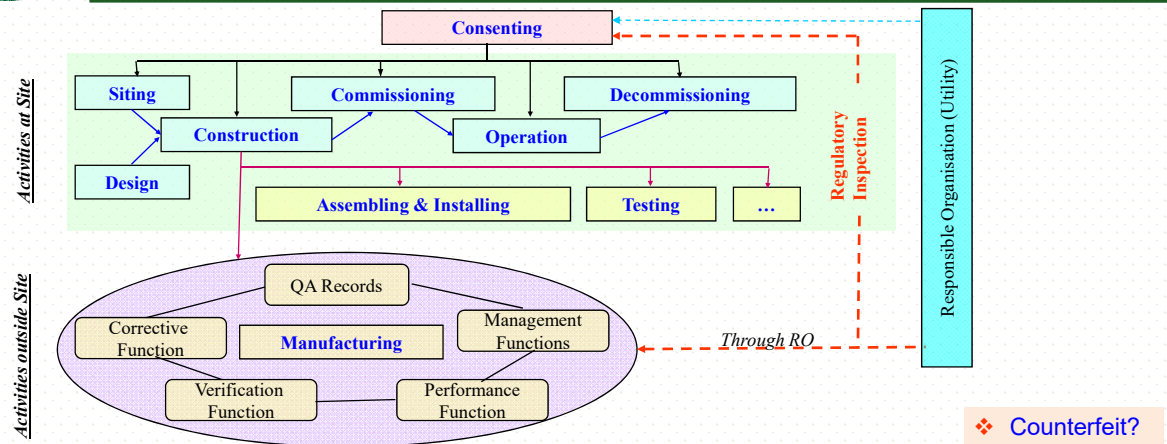
- Early Site Review
- Early Design Review



- Licensing process: Historically developed and adaptable to new designs
- Innovative system / design - Qualification by experiments, analysis
- Technical Support – TSO, R&D institutes, Academic institutions and Retired Experts



AERB Preparedness - Regulatory Oversight



- Off-site construction / commissioning activities
 - Factory built modules, factory fuelled modules – inspection & verification
 - Transportation of fuelled modules (interfaces with international agencies)

❖ Counterfeit?
❖ Falsification?



AERB Preparedness – Other Aspects

- Multi-Module considerations
- Number of Technologies and Number of Units - Human Resource
- Public Awareness & Confidence – especially new technology
- Additional consideration w.r.t Private & Other Entities
 - Design authority Construction, Commissioning, Operation, Maintenance, etc.
- Complete Fuel Cycle including waste management
- *Progressive In-house study on new and innovative technologies including SMRs*
- *Participation in IAEA's Review of Safety Standards Applicability to Novel Advanced Reactors*
- *Participation in IAEA NHSI-RT-WGs*



Summary

- Established regulatory framework evolved over time applicable for new build
 - Schedule and level of checks – graded approach
 - Stage-wise Clearances accorded after thorough review
- Most of the requirements are generic (technology neutral) and can be applied to new technologies
 - Technology specific requirements covered for WCRs & SFRs
 - Technology specific aspects may need to be evolved based on type of new technology.
 - AERB is progressively getting involved in multi-lateral and bilateral forums
- Further study and progressive revamping of Regulations and Processes - in progress



*Safety is an ever moving target, hence there
will be challenges at any given time*

Thank you

References

- *IAEA SRS 123: Applicability of IAEA Safety Standards to Non-Water-Cooled Reactors and SMRs*
- *IAEA DS537: Safety Demonstration of Innovative Technology in Nuclear Power Plants*