

Strategic Analysis

U.S. SMR COMMERCIAL DEPLOYMENT SEQUENCING: 18-MONTH FEDERAL STRATEGY FRAMEWORK

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A Note on Scope and Method

This report addresses one of the most consequential sequencing decisions in U.S. energy policy: how to allocate federal investment, regulatory attention, and supply chain coordination over the next 18 months to maximize the probability of meaningful commercial small modular reactor deployment by 2030. The decision is time-bounded, capital-constrained, and operationally complex. The analytical stakes are high because a misdiagnosed bottleneck leads to misallocated capital — and in a domain where first commercial units may cost \$1–5 billion and where regulatory cycles span years, a misdirected investment in 2026 cannot be corrected before 2030.

This analysis was produced using the Novo Navis causal reasoning framework, which is constitutionally structured to prevent correlation from being mistaken for causation. Every substantive finding in this report carries one of four explicit confidence labels — CAUSAL, MECHANISM, THRESHOLD, or CORRELATED — and the meaning of those labels is explained at first use.

Eight real-time web searches were conducted in May 2026 to ground the analysis in current market, regulatory, and financial conditions. Seventy external sources were processed and are cited inline throughout the report. Three independent analytical instances were deployed: one for domain analysis, one for adversarial challenge, and one for causal filter application at the System-level Primary Model (SPM). Where Instance 3 and Instance 4 disagreed on causal ratings, the SPM-level verdict prevails — and those disagreements are documented explicitly. Readers should treat the places where ratings were overridden as among the most important passages in the report, because they reveal where the analysis was most uncertain and where the consultant should probe hardest before client delivery.

A critical limitation governs this analysis: five active data gaps exist that could materially affect the recommendations. These are: vendor-specific burn rates and cash runway positions (GAP_001); detailed NRC review queue status for non-NuScale designs (GAP_002); domestic forging and vessel supplier capacity utilization and backlog data (GAP_003); micro-reactor customer pipeline visibility (GAP_004); and state-level

permitting and grid interconnection constraints by deployment site (GAP_005). Each gap is flagged inline at the relevant decision points throughout this report, and the final section provides specific verification steps the consultant must take before delivery.

No finding rated CORRELATED is treated as the basis for any recommendation. No finding rated THRESHOLD is treated as settled. The audit trail of uncertainty is not concealed in footnotes; it is woven through the analysis, because the consultant's credibility with their client depends on knowing exactly where the analysis is strong and where it is not.

Human review is required before this report is delivered to any client.

Executive Summary

The United States has a narrow and genuinely achievable window to achieve meaningful commercial SMR deployment by 2030, but only if federal investment, regulatory coordination, and supply chain action are sequenced against the correct binding constraints. This report finds that the binding constraints are vendor-specific, not universal — and the biggest risk in the current policy conversation is the application of a one-size-fits-all bottleneck framework to what is actually a differentiated portfolio of vendors with different primary constraints and different deployment timelines.

The broadest finding, rated CAUSAL, is that the 2028–2030 commercial deployment window is necessarily dominated by grid-scale SMRs, not micro-reactors. Micro-reactor designs are in early pre-certification review at the NRC, with licensing timelines of three to five years even under favorable conditions. This makes 2029–2031 the earliest realistic window for meaningful micro-reactor commercial deployment, and it means federal resources allocated to micro-reactor licensing in the 2026–2028 period are not accelerating near-term deployment — they are building infrastructure for the following decade. This is not a reason to abandon micro-reactor investment; it is a reason to fund it on a separate, appropriately paced track rather than competing it with grid-scale SMR priorities.

The second major CAUSAL finding is that design certification status, in combination with the regulatory mandate created by Executive Order 14299 (signed May 2025), determines which vendor is most credibly positioned for near-term deployment. NuScale Power holds the only full NRC design certification currently in effect, awarded January 2023, and the Executive Order requires the Secretary of Defense to commence operation of a nuclear reactor at a domestic military base by September 30, 2028. [1] This combination — regulatory certainty plus federal mandate — makes NuScale the highest-confidence near-term deployment candidate. Holtec is a strong second candidate with a clear design certification pathway and an active two-unit commitment at the Palisades site in Michigan. X-Energy is a conditional third candidate, contingent on accelerated NRC review for its TRISO-X design and resolution of high-assay low-enriched uranium fuel supply questions.

The third major finding, rated MECHANISM with MODERATE evidence strength, is that manufacturing capacity for nuclear-grade pressure vessels, forgings, and steam generators represents a genuine preparation constraint over the 18-month horizon, but it is not yet the primary binding constraint for current vendor

deployment pipelines. The distinction matters enormously for federal capital allocation. If manufacturing capacity were already the bottleneck, large tooling grants would be the first priority. The more accurate current situation is that demand from vendors has not yet materialized at a scale that exhausts supplier capacity — vendors are still resolving regulatory and site questions before placing firm manufacturing orders. This means federal manufacturing investment in 2026 should be targeted at contracting preparation and supplier qualification, not at capacity expansion per se. The timing of manufacturing investment must follow the regulatory and site confirmation sequence, not precede it.

A THRESHOLD finding — meaning a real correlation with no mechanistic proof yet established — is that grid interconnection and transmission capacity at specific deployment sites may be a show-stopping constraint if not investigated immediately. Grid operator studies for the NuScale military base deployment and the Holtec Palisades site have not been documented in the knowledge base supporting this analysis (GAP_005). This gap must be closed before any other sequencing decision is finalized, because if transmission upgrades are required, the planning horizon for those upgrades spans three to five years — longer than the reactor construction timeline itself.

The central strategic recommendation is a three-track federal approach. Track One concentrates 2026–2028 federal resources on enabling NuScale's 2028 military base deployment: site confirmation, grid interconnection study, regulatory milestone coordination, and supply chain reservation. Track Two positions Holtec's Palisades two-unit commitment for 2029–2030 deployment by accelerating design certification, securing state and federal permitting alignment, and staging the second federal tranche of the existing \$800 million commitment. [21][66][67] Track Three creates a separate, appropriately paced funding stream for micro-reactor licensing and customer pipeline development — targeting first deployments in 2031–2032 without competing micro-reactor spending against the near-term SMR priorities.

Capital allocation follows this logic: the existing \$800 million in committed federal cost-share funding for TVA/NuScale and Holtec is adequate if properly timed and milestone-gated, not lump-sum disbursed. [25][26][28] An additional \$150–200 million in targeted manufacturing preparation, NRC staffing, and HALEU fuel supply support is recommended within the 18-month window, with deployment conditional on resolution of the five active data gaps.

The overall confidence in the 2028 NuScale deployment is HIGH (approximately 75%), contingent primarily on site and grid confirmation. The overall confidence in the 2029–2030 Holtec Palisades deployment is MEDIUM-HIGH (approximately 65%), contingent on design certification progress and dual-unit execution capability. Confidence in meaningful commercial SMR deployment at scale by 2030 — defined as three or more operational units — is MEDIUM (approximately 55%), reflecting the cumulative risk of regulatory, site, manufacturing, and capital dependencies.

The Decision in Context

The decision this report addresses is not simply "should the United States invest in SMRs?" — that question was settled by legislative action and successive administrations over the past decade. The decision is narrower and more operationally specific: given that deployment by 2030 is the stated objective, and given that the 18-month window from May 2026 represents the last credible opportunity to influence the critical-path variables that determine 2030 outcomes, how should the federal government sequence its available instruments?

Those instruments are: direct grant funding (the existing \$800–900 million DOE commitment plus any future appropriations), loan guarantee availability through the Department of Energy Loan Programs Office, regulatory coordination (NRC staffing, expedited review protocols), supply chain policy (Defense Production Act authorities, critical supplier designation, manufacturing grants), executive mandate (the Secretary of Defense nuclear deployment requirement), and interagency coordination (DOE, DoD, NRC, Treasury, and state-level utility regulators).

The strategic context as of May 2026 has three defining characteristics that shape every recommendation in this report.

First, the global SMR development pipeline has grown to approximately 22 gigawatts of committed or announced capacity, with the United States leading. [9] This creates both opportunity and competition: U.S. vendors are competing for a global market, and foreign governments — particularly in Europe and Asia — are accelerating their own SMR programs. [33] The European Commission unveiled a strategy in March 2026 targeting first European SMRs online by the early 2030s. [33] This competitive dynamic strengthens the case for concentrated, timely U.S. federal action rather than broad, diluted investment.

Second, large technology companies are driving an unprecedented demand signal for clean, dispatchable power to serve AI data centers and hyperscale computing infrastructure. [2] This demand signal is real and is actively shaping vendor strategies, investor behavior, and utility procurement decisions. Microsoft, Google, and Amazon have all made public commitments to nuclear power, creating a private offtake market that did not exist five years ago. [2][4] The significance for federal strategy is that private capital is available for viable vendors at a scale that reduces the government's burden as capital provider — but increases the government's burden as market enabler, because private capital will flow only after regulatory certainty and site confirmation remove the largest uncertainties.

Third, the federal policy environment has shifted meaningfully in favor of nuclear deployment since 2024. The ADVANCE Act, executive orders on energy dominance, and the Secretary of Defense mandate together create a more permissive regulatory and political environment than the SMR sector has previously experienced. [61][62] The risk is not that political will is absent; the risk is that political will outpaces operational capacity, generating premature commitments and misallocated capital before the critical-path constraints are actually diagnosed.

The strategic question this report answers is: which constraints, if removed in the next 18 months, most directly expand the probability of commercial deployment by 2030 — and in what sequence should federal instruments be applied to remove them?

Situation Assessment

The Status of Key Vendors as of May 2026

NuScale Power holds the only active NRC design certification for an SMR in the United States, approved in January 2023 for its 77 MWe module design. [1][7] This is a significant regulatory advantage that no other domestic vendor currently shares. However, it is important to note that NuScale has not yet shipped a single commercial reactor module, and its near-term pipeline is dependent on the military deployment mandate rather than commercial market demand. [1][50] NuScale has recently opened an operations center in Houston, Texas, signaling ongoing organizational development. [47][48] The company's 2028 military base deployment target is the most credible near-term commercial deployment in the U.S. SMR portfolio, but it remains dependent on site confirmation, grid interconnection, and supply chain execution — none of which are yet publicly resolved.

Holtec Government Services was selected by the Department of Energy in December 2025 to receive approximately \$400 million in cost-shared federal funding to deploy two SMR-300 reactors at the Palisades site in Michigan. [21][66][67] The Palisades site was previously a nuclear facility, which provides meaningful advantages in state licensing familiarity and community acceptance. Holtec's commitment is to sequential two-unit deployment, which the adversarial analysis in this report correctly identifies as potentially reflecting vendor strategy for operational learning rather than confirmed manufacturing capacity constraint. Holtec's design certification for the SMR-300 is not yet complete as of May 2026, creating a regulatory prerequisite that must be resolved before construction authorization can be issued.

The Tennessee Valley Authority was selected alongside Holtec in December 2025 to receive the remaining portion of the DOE's up to \$800 million federal commitment. [21][66][67] TVA's involvement in the program — specifically as an owner-operator rather than a technology developer — is strategically significant. TVA has existing nuclear operational experience, regulatory relationships, and site infrastructure that most SMR vendors lack. TVA's participation reduces execution risk and provides an operational counterparty with deep institutional credibility.

X-Energy is developing the Xe-100 reactor using TRISO-X fuel, a high-temperature gas-cooled design. X-Energy raised \$700 million in a 2025 funding round. [5] However, X-Energy has not yet achieved NRC design certification, is dependent on high-assay low-enriched uranium fuel whose domestic production is ramping but not yet confirmed sufficient for near-term deployments, and has a licensing timeline that places realistic commercial deployment in the 2028–2030 range only if NRC review is significantly accelerated. X-Energy's involvement in the DOE Gen III+ program creates a conditional pathway, but the conditions are numerous.

Oklo is pursuing a different strategy focused on smaller fast reactor designs. Oklo received early attention in 2025–2026 as military applications drove renewed interest in micro-reactor concepts. [8] However, Oklo's design is in NRC pre-certification review, and the licensing timeline precludes meaningful commercial deployment before 2029–2031 at the earliest.

Radiant Nuclear is developing a micro-reactor for remote and military applications, having raised \$225 million. [5] Like Oklo, its licensing timeline is three to five years, placing realistic deployment in the 2030–2032 range at best. The demand signal from the U.S. Army and remote industrial customers is real, [8] but the licensing constraint is a hard physical limit on deployment speed regardless of capital availability.

The Global Pipeline Context

The global SMR project pipeline has reached approximately 22 gigawatts of announced or committed capacity, with the United States leading market positioning. [9] The U.S. EIA has documented multiple SMR and micro-reactor designs under development in the United States, reflecting the breadth of the design portfolio. [30] However, breadth of the development portfolio is not the same as depth of deployment readiness. As of May 2026, the number of designs with NRC design certification remains one (NuScale's 77 MWe module). [1]

The global competitive picture is relevant for a specific reason: as foreign governments accelerate their own SMR programs and offer favorable financing terms to domestic vendors, the risk of U.S. vendor talent, supply chain, and capital migrating toward overseas deployment increases. This is not a near-term risk (18 months) but it is a medium-term risk (36–48 months) that federal strategy should anticipate.

Federal Capital Commitment Status

The DOE's \$900 million funding opportunity for Generation III+ SMR deployment was active across two rounds, with the most recent reissuance realigned to an energy dominance agenda. [61][62][65] The December 2025 selection of TVA and Holtec committed approximately \$800 million in cost-shared federal funding. [21][24][25][26][28][66][67] An additional \$100 million in reserve or reallocation authority exists within the original program structure. [25][26] The DOE has also maintained a broader research and development funding stream through the FY2026 budget process. [20][29]

The critical point about the existing capital commitment is not its total size but its disbursement structure. Cost-shared funding disbursed on a milestone basis means vendors must demonstrate achievement of specified technical or regulatory milestones before federal tranches are released. This milestone-based structure is sound in principle — it prevents capital from flowing to stalled projects — but it creates a timing risk: if milestone achievement is delayed by regulatory review or site issues, federal capital is withheld at precisely the moment vendor cash flow is most stressed.

Current Manufacturing and Supply Chain Context

Supply chain constraints for nuclear-grade components are a growing concern documented across multiple industry sources. [13][14] Critical components — including reactor pressure vessels, forgings, and steam generators — require long lead times and involve suppliers who are increasingly selective about commitment.

[13][14] The U.S. has a limited number of fabricators capable of ASME nuclear-code-compliant work, with commonly cited capacity estimates in the two to three units per year range without capital expansion. [13][53]

However — and this is a finding that the causal filter revised from Instance 3's original assessment — the evidence that manufacturing capacity is currently the primary binding constraint on deployment is MODERATE at best. [GAP_003] The more accurate characterization is that manufacturing capacity is a preparation constraint that will become binding when vendor demand materializes. The constraint is imminent but not yet operative, and federal capital to address it should follow the sequence of vendor commitment and site confirmation rather than preceding it.

Analytical Framework Applied

This report applies the Novo Navis three-stage causal filter to every substantive finding. The framework is explained here at first use and referenced by label throughout the report.

The four causal labels used in this report mean the following:

CAUSAL means all three stages of the filter are satisfied: a correlation has been observed, a directional mechanism has been identified explaining why the correlation exists, and empirical evidence has confirmed the mechanism operates as claimed. **CAUSAL** findings are treated as the core of strategic recommendations and stated with confidence proportional to evidence strength.

MECHANISM means stages one and two are satisfied — a correlation is observed, and a plausible directional mechanism is identified — but empirical evidence for stage three is pending. **MECHANISM** findings are included in recommendations with appropriate caveats and flagged for follow-up.

THRESHOLD means the stage one correlation is statistically real and reproducible, but no plausible mechanism can be identified despite genuine effort. **THRESHOLD** findings are not discarded — they are flagged as genuine knowledge gaps and routed to probability estimation. **THRESHOLD** findings are treated as potential show-stoppers requiring immediate investigation, not as background context.

CORRELATED means stage one only — two variables co-move, but no mechanism is identified and no causal claim is made. **CORRELATED** findings are mentioned for contextual awareness but never form the basis of a recommendation.

A mandatory corollary governs this report: every finding rated **CAUSAL** or **MECHANISM** by the analytical instances was independently reviewed at the SPM level. Where SPM overrode an instance rating, the SPM rating prevails. In this analysis, there were five SPM overrides and one agreement out of six primary findings reviewed — a high override rate that reflects the analytical difficulty of distinguishing genuine causal structure from plausible-sounding but unproven mechanisms in a complex, pre-deployment industrial domain. The override decisions are incorporated into every finding below and into the capital allocation recommendations.

The specific causal chain structure applied to this domain works as follows. Deployment outcomes are determined by the interaction of five constraint variables: regulatory certification status, manufacturing capacity,

vendor capital runway, fuel supply availability, and grid interconnection readiness. These constraints are parallel and interdependent, not sequential. A vendor cannot deploy without satisfying all five; the binding constraint is whichever one reaches zero capacity first for that specific vendor's deployment plan. Federal strategy must therefore be vendor-differentiated — not a universal sequencing model applied uniformly.

This parallel constraint structure is itself a CAUSAL finding, derived from the adversarial analysis that successfully challenged Instance 3's original linear sequencing framework. The correction matters for federal capital allocation: it means there is no single "first" action that unlocks everything else. Rather, there is a portfolio of parallel actions, each targeted at a specific vendor's specific binding constraint, that must be executed simultaneously across the first six months of the 18-month window.

Causal Analysis of Key Drivers

Finding 1: Design Certification Status Determines Which Vendors Can Deploy in 2028–2030

Confidence Label: CAUSAL

Evidence Strength: VERY STRONG for NuScale; STRONG for X-Energy and Radiant with qualification SPM
Override: Confidence calibrated to 70% (reduced from Instance 3's 90%) due to the role of the SecDef mandate

The correlation is unambiguous: NuScale holds the only current NRC design certification, and NuScale is the only vendor with a credible 2028 deployment timeline. [1][7] The mechanism is equally clear: NRC design certification is a regulatory prerequisite for commercial reactor construction and operation. No vendor can obtain a construction permit or operating license for a design that has not cleared the design certification process. This is not a probabilistic constraint — it is a legal one.

The causal chain runs: certification complete → legal pathway open → construction permit eligible → commercial deployment possible. The reverse is equally deterministic: no certification → no legal pathway → no commercial deployment. [1]

The SPM-level qualification on this finding is important. Instance 3 rated this as CAUSAL with very high confidence and attributed the 2028 NuScale timeline to certification status. Instance 4's adversarial challenge correctly identified that the actual driver of the 2028 NuScale timeline is Executive Order 14299, which requires the Secretary of Defense to commence nuclear reactor operation at a domestic military base by September 30, 2028. [8] The certification is a necessary precondition, but the mandate is the sufficient condition that creates the urgency. Without the mandate, NuScale's commercial deployment timeline based on market economics alone would more likely be 2029–2031.

For X-Energy and Radiant, design certification is a necessary condition for deployment but is one of multiple binding constraints. X-Energy also faces HALEU fuel supply questions and capital raise timing dependencies. Radiant faces all of the above plus micro-reactor novelty in regulatory review. Stating that "certification

determines timeline" for these vendors is an oversimplification: it is the first necessary condition, but certification alone, if achieved, would still leave multiple other constraints unresolved.

Implication for Federal Strategy: Regulatory acceleration efforts for X-Energy should be pursued but calibrated: NRC staffing support and pre-application review resources are appropriate, but the expectation that accelerating NRC review will by itself advance X-Energy's commercial deployment date by more than one to two years is not supported by the evidence. Parallel actions on fuel supply and manufacturing preparation are equally necessary for X-Energy's timeline.

Finding 2: Manufacturing Capacity Is a Preparation Constraint, Not Yet the Primary Binding Constraint

Confidence Label: MECHANISM

Evidence Strength: MODERATE SPM Override: Downgraded from Instance 3's MECHANISM (imminent, binding) to MECHANISM (preparation, conditional) following adversarial elimination of demand uncertainty and pricing power as alternative mechanisms

The correlation is real: nuclear-grade pressure vessel fabricators report long lead times, suppliers are selective about commitment, and commonly cited domestic capacity estimates are two to three units per year without capital injection. [13][14][53] The mechanism is physically plausible: specialized fabrication equipment, ASME-certified labor, and nuclear-qualified quality systems require significant investment to expand, with timelines of 24–36 months for new fabrication lines.

However, the adversarial challenge established that the correlation between "selective suppliers" and "capacity constraint" is consistent with at least four alternative mechanisms: supplier pricing power in a thin market with few early customers; demand uncertainty (vendors have not yet placed firm orders); technical risk aversion (suppliers hedge against redesign risk); and industry consolidation dynamics. [GAP_003] None of these alternative mechanisms were eliminated by the evidence in the knowledge base.

The most important evidential observation is that Holtec's sequential deployment strategy — deploying its two SMR-300 units one at a time rather than simultaneously — is consistent with vendor choice for operational learning, cash flow management, and grid operator comfort, not necessarily with manufacturing capacity exhaustion. If manufacturing capacity were the primary binding constraint, we would expect vendors to be urgently lobbying for capacity expansion grants and publicly declaring supply chain starvation; this advocacy is muted relative to calls for regulatory acceleration and fuel supply action.

The corrected characterization is that manufacturing capacity is a preparation constraint: it will become binding at the point where vendor demand materializes and exceeds supplier ability to respond. Federal action in 2026–2027 should focus on contracting preparation (supplier qualification, pre-positioning of tooling commitments, workforce training initiation) rather than large-scale capacity expansion grants, because the demand signal that would justify large-scale expansion has not yet materialized in the form of firm vendor orders.

Implication for Federal Strategy: Allocate \$50–75 million in manufacturing preparation grants in the first six months: supplier qualification programs, tooling feasibility studies, and workforce training pipeline initiation. Reserve the larger manufacturing expansion allocation (\$100–150 million) for the Month 6–12 window, conditional on firm vendor orders materializing. Do not frontload manufacturing grants before vendor order confirmation. [GAP_003 must be resolved — see verification section.]

Finding 3: HALEU Fuel Supply Is a Genuine Knowledge Gap for 2028–2030 Deployment

Confidence Label: THRESHOLD

Evidence Strength: WEAK for near-term binding constraint; MODERATE for long-term (2030+) constraint SPM
Override: Upgraded from Instance 3's MECHANISM (leaning CAUSAL) to THRESHOLD, reflecting adversarial identification of multiple unresolved knowledge gaps

The correlation is documented: the United States lacks sufficient domestic HALEU production for the long-term SMR deployment scenarios it has announced, with demand projected at approximately 50 metric tons per year by 2035 and Centrus's production ramp ongoing since 2024. [5] The mechanism is physically sound: HALEU fuel is a necessary input for HALEU-dependent reactor designs; without fuel, reactors cannot operate.

However, three critical knowledge gaps prevent elevation of this finding to MECHANISM. First, the distinction between enrichment capacity and fuel fabrication capacity is unresolved — Centrus produces enriched uranium, but TRISO fuel fabrication (pelletizing, cladding, assembly) involves different processes and different suppliers, and it is not established which is the actual bottleneck for X-Energy's TRISO-X design. [5] Second, the HALEU demand forecast for the specific 2028–2030 window is not established — the 50 MT/year figure is a 2035 long-term projection; if only one or two HALEU-dependent reactors deploy by 2030, near-term demand may be five to ten metric tons per year, which may be within Centrus's production capacity. Third, alternative supply options — overseas enrichment (France, UK), lower enrichment substitution, or stored domestic material — have not been evaluated or eliminated as mitigation pathways.

Note on Threshold Classification: This finding meets the THRESHOLD criteria properly. It is not lazy analysis — the knowledge gap is genuine and not addressable through better reasoning alone. It requires empirical data (Centrus production confirmation, X-Energy fuel supply contracts, TRISO fabrication capacity assessment) that is not in the knowledge base. The practical treatment of this finding is: assume HALEU supply is a potential show-stopper for X-Energy and other TRISO or HALEU-dependent designs, but do not treat it as confirmed binding until data is obtained.

Implication for Federal Strategy: Before committing to X-Energy as a core 2028–2030 deployment candidate, resolve the HALEU supply question. This requires: (a) Centrus production schedule confirmation for 2027–2028; (b) X-Energy fuel supply contract status; (c) TRISO fuel fabrication capacity assessment from the Oak Ridge or related production facility. If HALEU supply is confirmed adequate for near-term deployments (i.e., demand is small relative to ramping capacity), X-Energy advances to active deployment track. If HALEU supply is confirmed deficient, X-Energy is deferred to a 2030–2031 target with a separate fuel supply acceleration

program.

Finding 4: Grid Interconnection and Site Transmission Capacity Is a Potential Show-Stopper Requiring Immediate Investigation

Confidence Label: THRESHOLD

Evidence Strength: ABSENT from knowledge base SPM Override: Agreed with adversarial upgrade — this is correctly THRESHOLD but should be treated as a higher-priority concern than Instance 3 originally assigned it

Grid-connected SMRs require transmission capacity to deliver power to the network and frequency response accommodation by the grid operator. Grid planning and interconnection queue timelines in major U.S. grid regions (PJM, MISO, SPP) currently run three to five years from interconnection request filing to study completion and approval. If interconnection requests for the NuScale military base site and the Holtec Palisades site were not filed by 2022–2024, transmission upgrades cannot be completed by 2028–2030 even if reactor construction proceeds on schedule.

There is no data in the knowledge base on the interconnection filing status or grid operator study completion for either deployment site. [GAP_005] This is the highest-priority data gap in the entire analysis, because it is the constraint with the longest potential remediation timeline relative to the 2030 deployment window. A manufacturing bottleneck identified in Month 6 can potentially be addressed by Month 18 through tooling and workforce investment. A grid interconnection gap identified in Month 12 cannot be remediated before 2027 or 2028.

One important caveat: the NuScale military base deployment may partially mitigate this risk. Military installation power systems sometimes operate in island mode or have dedicated transmission infrastructure, potentially reducing or eliminating grid operator interconnection requirements. This possibility needs immediate verification. Holtec Palisades, by contrast, is a civilian utility deployment and will require full grid operator interconnection review under FERC and MISO rules.

Implication for Federal Strategy: Month 0 action — before any other sequencing decision is confirmed — commission site-specific grid operator studies for both the NuScale military base candidate site(s) and the Holtec Palisades deployment. This study is not a routine permitting step; it is a strategic prerequisite that determines whether the 2028–2030 timeline is physically achievable. Federal coordination with NERC, MISO, and relevant regional transmission organizations should be initiated immediately.

Finding 5: Vendor Capital Runway Is a Future Risk, Not a Current Binding Constraint

Confidence Label: MECHANISM

Evidence Strength: MODERATE for the mechanism; WEAK for current imminence SPM Override: Confirmed as MECHANISM but reduced imminence from Instance 3's assessment

The mechanism is economically sound: all major SMR vendors are pre-revenue, operating on capital raises and federal grants. With burn rates of \$50–100 million per year and first-unit commissioning targets in 2028–2030, any vendor whose capital runway expires before commissioning will face a funding cliff — either a stalled project or an involuntary capital raise at unfavorable terms. [GAP_001]

The adversarial challenge correctly identified that current funding availability is substantial: X-Energy raised \$700 million, Radiant raised \$225 million, and Holtec and TVA have \$800 million in committed federal cost-share. [5][21][66][67] There is no current evidence that any major vendor faces an imminent funding gap. The risk is conditional and future-oriented: if milestone achievement is delayed (regulatory, site, or manufacturing), vendor runway may be exhausted before revenue begins.

The practical implication is that the federal government's role in capital runway management is structural rather than emergency: design the DOE milestone-based grant disbursement to align with vendor burn rate cycles, not to create gaps at milestone transitions. The largest single structural risk is that DOE grant tranches are disbursed on a milestone certification timeline that does not match vendor monthly operating cash needs, creating artificial gaps even when the project is progressing normally. [GAP_001]

Implication for Federal Strategy: Request vendor burn rate disclosures and runway forecasts as a condition of grant disbursement. Map DOE milestone certification timelines against vendor cash cycle needs and adjust tranche sizing and timing to prevent structural cash gaps. This is an administrative action (grant restructuring) rather than a capital injection action, and it should cost nothing beyond DOE administrative resources.

Finding 6: Micro-Reactor Deployment Cannot Realistically Occur Before 2029–2031

Confidence Label: CAUSAL

Evidence Strength: STRONG SPM Override: Agreed with Instance 3's CAUSAL rating; no override applied

This is the one finding on which the analytical instances agreed at the SPM level. Micro-reactor designs — generally defined as below 20 MWe — are in early pre-certification review at the NRC, with licensing timelines of three to five years even under favorable conditions, compared to two to three years for Gen III+ SMRs that benefit from established precedent. [30][34] The mechanisms are clear and directional: micro-reactors involve novel passive safety systems, autonomous operation concepts, and remote location deployment scenarios that are less precedented in the NRC review framework, increasing documentation burden and review duration. Manufacturing constraints for micro-reactors are smaller (components are physically smaller, less specialized), so it is licensing, not manufacturing, that is the deterministic binding constraint.

This finding has a direct implication for the question of whether federal resources should be divided between micro-reactors and larger SMRs in the 2026–2028 investment window. The answer is that dividing near-term resources reduces probability of near-term (2030) deployment for both categories, while concentrating resources on grid-scale SMRs maximizes 2030 deployment probability. Micro-reactor licensing investment in 2026–2028

is not wasted — it is infrastructure for 2031–2035 deployment — but it should be funded on a separate track with a separate appropriation, not as a competitor to grid-scale SMR priorities.

Finding 7: Vendor Funding Size Does Not Predict Commercialization Speed

Confidence Label: CORRELATED — included for contextual awareness only, not a recommendation basis

X-Energy's \$700 million raise and Radiant's \$225 million raise [5] co-occur with their respective deployment plans, but funding size does not causally determine deployment timeline. Licensing is regulatory, not capital-constrained. Manufacturing capacity is determined by supplier infrastructure, not vendor capital. Technology readiness is determined by engineering maturity, not balance sheet size. The finding that funding size is CORRELATED but not CAUSAL is an important check on the intuition that well-funded vendors should be prioritized simply because they are well-funded. NuScale is the highest-confidence near-term deployment candidate not because it has the largest recent capital raise, but because it has the regulatory certification and the federal mandate that no amount of funding can substitute for in the near term.

Recommendation and Rationale

The Central Recommendation: A Three-Track Parallel Federal Strategy

The recommendation emerging from the causal analysis is a three-track parallel federal strategy, executed simultaneously rather than sequentially, with vendor-specific bottleneck prioritization rather than a universal sequencing model. The three tracks are:

Track One — NuScale 2028 Military Base Deployment (CAUSAL-rated, highest confidence)

The federal government should treat NuScale's 2028 military base deployment as the primary near-term strategic milestone and concentrate Track One resources on the four constraints that could prevent it: site confirmation, grid interconnection, supply chain reservation, and regulatory milestone coordination.

Causal Chain for Track One Recommendation:

Executive Order 14299 mandate (sufficient condition) + NuScale design certification (necessary condition) → legally open deployment pathway → 2028 deployment feasible if and only if site, grid, supply chain, and milestone coordination are resolved. Federal instruments can accelerate all four of these sub-constraints within 18 months if initiated at Month 0. The mandate creates a hard deadline that makes delays non-negotiable, which paradoxically simplifies the federal coordination task: every stakeholder — NuScale, DoD, DOE, NRC, and site operators — is working against the same September 2028 deadline with no room for drift.

Specific Track One actions:

Month 0–3: Commission grid operator study for candidate military base site(s); confirm site selection; file or confirm interconnection request. This action is the critical path item with the longest potential lead time. The total cost of this study is low (\$2–5 million) but it must be initiated immediately to avoid becoming binding. [GAP_005]

Month 0–6: Reserve supply chain capacity. NuScale should be instructed (as a condition of federal funding) to place binding purchase orders or reservation agreements with nuclear-grade pressure vessel and major component suppliers within the first six months. Federal purchase guarantee authority (analogous to Defense Production Act mechanisms) should be invoked if necessary to enable suppliers to accept reservations without full commercial risk. This resolves the pricing power and demand uncertainty confounds identified in the adversarial analysis: firm orders eliminate the ambiguity about whether supplier selectivity reflects capacity constraint or demand uncertainty.

Month 3–9: Regulatory milestone coordination. DOE should establish a dedicated NuScale-DoD deployment coordination cell with NRC liaison to ensure that the standard Design Approval, Construction Permit, and Operating License milestone sequence is being worked without gaps. The NRC is an independent regulatory body and cannot be directed to approve — but DOE can fund additional NRC staffing and ensure that review queues for NuScale documents are prioritized within the existing legal framework.

Track Two — Holtec Palisades 2029–2030 Deployment (MECHANISM-rated for manufacturing readiness; CAUSAL for regulatory prerequisite)

The federal government should treat Holtec's Palisades commitment as the primary second-wave commercial deployment and concentrate Track Two resources on: accelerating Holtec SMR-300 design certification, managing dual-unit execution complexity, resolving Michigan state-level permitting, and staging federal tranche releases to Holtec's actual construction milestone schedule.

Causal Chain for Track Two Recommendation:

Holtec has secured federal cost-share commitment and has an active deployment site with existing nuclear infrastructure advantages. [21][66][67] The binding constraint is design certification for the SMR-300 — without it, no construction permit can be issued. [GAP_002] Parallel manufacturing preparation can proceed without certification (long-lead component fabrication planning, supplier qualification), but construction authorization requires certification. Federal action that accelerates SMR-300 certification — specifically NRC pre-application review resources and DOE technical assistance to Holtec's documentation team — directly expands the probability of 2029–2030 deployment at Palisades.

Specific Track Two actions:

Month 0–6: Commission grid operator study for Palisades (MISO interconnection). This has equal urgency to the NuScale grid study given Palisades' civilian utility grid connection requirement. [GAP_005]

Month 3–9: DOE technical assistance for Holtec SMR-300 design certification. Fund additional NRC reviewer capacity for SMR-300 documents. Establish monthly certification milestone tracking with go/no-go assessment against Holtec's deployment schedule.

Month 6–12: Initiate manufacturing preparation for Holtec's two-unit commitment. Upon firm construction timeline confirmation (conditional on certification progress), authorize manufacturing preparation grants (\$75–100 million) for pressure vessel and major component fabrication. Time this to follow rather than precede construction timeline confirmation.

Month 9–18: Stage federal tranche releases for Holtec against construction milestones: site preparation, foundation pour, major component delivery. Ensure DOE milestone certification procedures are mapped to Holtec's cash cycle (resolving the structural gap risk identified in Finding 5).

Track Three — Micro-Reactor 2031+ Development (CAUSAL-rated for licensing timeline; managed separately)

The federal government should establish a separate, appropriately paced funding stream for micro-reactor licensing and customer pipeline development, explicitly decoupled from the 2026–2030 grid-scale SMR priority. This track acknowledges that micro-reactor deployment before 2029 is not achievable (CAUSAL finding) and that federal investment in micro-reactor licensing is infrastructure for 2031–2035, not a near-term deployment accelerant.

Track Three should be funded at \$50–75 million over the 18-month window, targeted at: NRC pre-application review engagement for the two or three most credible micro-reactor designs (Oklo, Radiant); military and remote customer demand characterization (GAP_004); and fuel supply planning for micro-reactor-specific fuel forms.

Track Three must be managed as a separate appropriation, not as a reallocation from Track One or Track Two. Combining the tracks in a single appropriation invites resource competition that will harm both near-term and long-term objectives.

X-Energy Conditional Track

X-Energy occupies a distinct position: it is a grid-scale SMR developer with a meaningful capital raise and a design that could participate in the 2028–2030 deployment window if certification and fuel supply are resolved. The recommendation is to treat X-Energy as a conditional participant in the 2028–2030 window, with a decision gate at Month 6 that evaluates: (a) NRC design certification progress toward a 2027 completion; (b) HALEU supply contract status and Centrus production confirmation; (c) X-Energy capital runway adequacy.

If Month 6 conditions are met, X-Energy advances to active deployment track with DOE coordination support. If any condition is not met, X-Energy is deferred to a 2030–2031 target with its funding allocation preserved but resequenced. The federal government should not make binary "in or out" decisions about X-Energy in Month 0; it should set explicit criteria and enforce them.

Alternatives Considered

Alternative A: Broad-Based Investment Across All SMR Vendors and Micro-Reactors

This alternative would distribute the available \$800–900 million in federal commitment across all active SMR and micro-reactor developers in roughly equal allocations, on the theory that portfolio diversity maximizes the probability that at least one technology reaches commercial deployment by 2030.

This approach was considered and rejected for the following reasons grounded in the causal analysis.

First, the causal analysis establishes that design certification status is a deterministic prerequisite for deployment, and that the vendors without certification have two to five year licensing timelines. [1] Distributing capital equally across certified and uncertified vendors does not accelerate certification — it subsidizes pre-revenue operations across a broader vendor base without advancing any vendor's certification timeline. The certification constraint is regulatory, not capital-constrained, for the vendors at later licensing stages.

Second, the manufacturing constraint analysis (MECHANISM rating) establishes that manufacturing capacity is preparation-limited — it requires vendor demand to materialize before expansion is justified. Broad-based investment creates diffuse demand signals across many vendors rather than concentrated demand that allows supplier capacity to be calibrated and committed.

Third, the grid interconnection THRESHOLD finding is site-specific. If grid capacity is available at the NuScale military base and Palisades sites, deployment proceeds there regardless of what other vendors are doing. If grid capacity is not available, additional investment in other vendors does not solve that problem. Broad investment diversification does not address site-specific infrastructure constraints.

The central objection to this alternative is that it optimizes for portfolio appearances rather than deployment outcomes. The goal is "meaningful commercial deployment by 2030," not "maximum number of vendors receiving federal support by 2028."

Alternative B: Concentrate All Resources on a Single "Best Bet" Vendor (NuScale Only)

This alternative would concentrate the entire federal commitment on NuScale's 2028 military base deployment, on the theory that this is the only CAUSAL-rated near-term deployment with both regulatory certainty and a hard deadline mandate.

This approach was considered and rejected for the following reasons.

First, the 2028 NuScale deployment, even if successful, represents a single unit at a military installation. "Meaningful commercial deployment by 2030" requires at least two to three operational units, with demonstrated commercial economics and replicable deployment processes. A single military demonstration does not constitute meaningful commercial deployment.

Second, concentrating all resources on NuScale creates single-point-of-failure risk. If site selection, grid interconnection, or supply chain execution encounter delays at the NuScale deployment (all THRESHOLD risks),

there is no fallback commercial deployment to preserve the 2030 objective.

Third, Holtec's Palisades commitment is sufficiently advanced — with committed federal cost-share, an existing nuclear site, and a clear two-unit deployment plan — that abandoning it in favor of NuScale concentration would waste already-committed organizational and capital investment.

The recommended three-track approach addresses both objections: it maintains NuScale as the primary near-term objective while building Holtec as the second-wave deployment and establishing micro-reactor infrastructure for the 2031+ period.

Why the Recommended Approach Is Preferred

The three-track parallel approach is preferred over both alternatives because it matches the causal structure of the actual constraint landscape: constraints are parallel and vendor-specific, not sequential and universal, and the deployment portfolio needed to achieve "meaningful commercial deployment by 2030" requires at least two successfully executed vendor deployments. [18] The approach concentrates the highest resources on the highest-confidence deployment (NuScale, Track One), invests in building the second deployment (Holtec, Track Two) without cannibalizing Track One resources, and establishes the longer-term infrastructure (micro-reactor, Track Three) on a separate appropriation. It is the configuration most consistent with the causal evidence and least dependent on any single assumption being correct.

Risk Analysis

Risk 1: Grid Interconnection Is Not Confirmed for Either Primary Deployment Site

Risk Rating: HIGH | Causal Stage: THRESHOLD | Evidence: ABSENT (GAP_005)

This is the highest-probability show-stopper risk in the analysis. If transmission capacity is not available at the NuScale military base site and requires multi-year grid upgrades, the 2028 deadline established by Executive Order 14299 cannot be met through grid-connected operation. Alternative paths — island mode operation, dedicated military transmission, or emergency transmission upgrade authorization — may exist but require immediate evaluation.

The same risk applies to Holtec Palisades, where MISO interconnection requirements must be verified. MISO interconnection queue timelines for new generation are currently two to four years in many queue regions.

Mitigation: Month 0 grid operator studies (see Track One and Track Two actions). If studies reveal transmission constraints, escalate immediately to DOE-FERC-MISO coordination with emergency designation. Budget \$20–50 million for grid coordination and, if necessary, targeted transmission investment.

Risk 2: NuScale Site Selection Is Delayed Beyond Month 3

Risk Rating: MEDIUM-HIGH | Causal Stage: CAUSAL (site selection is a necessary condition)

The 2028 military base deployment requires a specific installation to be selected, environmental review completed, and facility design initiated. If site selection slips beyond Month 3, the critical path for environmental review, facility design, and construction cannot be completed by September 2028. The DoD has multiple potential candidate sites, but the selection process involves interagency coordination, community engagement, and environmental assessment.

Mitigation: DoD should initiate site selection in parallel with this strategic framework, not as a subsequent step. Federal strategy should assume site selection is a Month 0 deliverable, with Month 3 as the absolute latest acceptable date for site identification.

Risk 3: Holtec SMR-300 Design Certification Is Delayed Beyond 2027

Risk Rating: MEDIUM | Causal Stage: CAUSAL (certification is necessary prerequisite)

If Holtec's SMR-300 design certification slips beyond the 2027 window currently anticipated, the construction permit and construction authorization sequence cannot be completed before 2028, making 2029 deployment at Palisades impossible and 2030 unlikely. The NRC review process for a novel design involves iterative rounds of technical questions and vendor responses; delays in any round compress the subsequent timeline. [GAP_002]

Mitigation: DOE technical assistance for Holtec certification documentation; NRC pre-application review resource augmentation; monthly milestone tracking with 90-day advance warning trigger if schedule shows signs of slippage.

Risk 4: HALEU Fuel Supply Fails to Materialize for X-Energy's Deployment Timeline

Risk Rating: MEDIUM (THRESHOLD — not yet confirmed as binding) | Evidence: WEAK

If Centrus's HALEU production does not meet X-Energy's fuel supply needs by 2027–2028, and if no alternative supply (overseas HALEU, lower-enrichment design modification) is available, X-Energy's deployment is deferred to 2030–2031. This risk is not currently confirmed as binding (the 2035 demand projection does not resolve the 2028–2030 question), but the absence of evidence is not evidence of absence. [5]

Mitigation: HALEU demand-supply analysis for 2027–2030 window; Centrus production schedule confirmation; evaluation of overseas HALEU supply options as contingency. Decision gate at Month 6 on X-Energy advancement.

Risk 5: Vendor Cash Flow Gap Between Milestone Tranches

Risk Rating: MEDIUM-LOW | Causal Stage: MECHANISM

As described in Finding 5, the structural risk is misalignment between DOE milestone certification timing and vendor monthly cash needs. This risk is manageable through administrative grant restructuring but must be addressed proactively, not reactively. [GAP_001]

Mitigation: Vendor burn rate disclosure requirement as grant condition; DOE grant tranche redesign to match cash cycle; interim bridge funding authority if milestone certification causes unexpected gap.

Sensitivity Analysis and Fragile Assumptions

Assumption 1: The NuScale 2028 Military Base Mandate Survives Policy Changes

Fragility: LOW-MEDIUM

The executive order creating the SecDef mandate is subject to policy revision or implementation flexibility. If the administration's priorities shift or the mandate is waived, the external driver that creates NuScale's hard deadline disappears, and commercial deployment reverts to market-economics timing (likely 2029–2031). This would not eliminate NuScale as a deployment candidate but would reduce urgency and increase the risk of schedule drift.

If this assumption fails: Extend the primary deployment target for NuScale to 2029 and rebalance Track One and Track Two to equal priority. The three-track structure remains valid; only the timeline pressure on Track One is reduced.

Assumption 2: Grid Interconnection Is Available or Achievable by 2027 for Both Primary Sites

Fragility: HIGH (this is the most fragile assumption in the analysis)

The entire deployment sequencing assumes that transmission capacity is either available or can be secured within the deployment timeline. If grid operator studies (which have not yet been commissioned) reveal that multi-year transmission upgrades are required, the 2028 NuScale deadline and the 2029–2030 Holtec deadline both become impossible to achieve through grid-connected operation.

If this assumption fails: Evaluate island-mode operation for the NuScale military installation; evaluate alternative Holtec sites with better grid connectivity; and accelerate federal transmission infrastructure investment as a parallel program. The recommendation ranking changes: Track One grid infrastructure becomes the top priority, potentially exceeding manufacturing or regulatory actions in urgency and cost.

Assumption 3: Holtec SMR-300 Design Certification Is Completed by Late 2027

Fragility: MEDIUM

This assumption is grounded in Holtec's stated timeline and the DOE's selection of Holtec as a primary funded vendor, but NRC design certification timelines have historically experienced overruns. [GAP_002] NuScale's certification took approximately seven years; subsequent designs benefit from established review frameworks but are not immune to delays.

If this assumption fails: Palisades deployment slips to 2030–2031; the only 2028–2030 deployment is NuScale's military unit; "meaningful commercial deployment by 2030" requires redefining what "meaningful" means; or the X-Energy conditional track must be accelerated if its certification and fuel supply resolve favorably.

Assumption 4: Manufacturing Supplier Capacity Can Expand From 2–3 to 4–5 Units Per Year by 2029 With Capital Injection

Fragility: MEDIUM (note: this figure is from Education_1 and lacks independent verification — GAP_003)

The manufacturing capacity expansion assumption underlies the Track Two manufacturing preparation investment. If domestic supplier capacity is harder to expand than estimated (e.g., qualified workforce bottleneck is more severe than tooling bottleneck, or if the capacity estimate itself is inaccurate), the manufacturing preparation investment in months 6–12 will fail to produce the expected capacity increase by 2029.

If this assumption fails: Overseas fabrication (UK, France, Japan) must be authorized as primary or supplemental supply for Holtec components; premium cost is accepted; or deployment timelines slip one to two years.

Assumption 5: Private Capital Continues to Flow Into the SMR Sector Through 2028

Fragility: LOW-MEDIUM

The current investment environment, characterized by strong Big Tech demand signals for clean power [2][4] and multiple recent large funding rounds, is favorable for SMR vendor capital access. If the AI data center demand narrative weakens, interest rates rise significantly, or a prominent SMR program failure damages investor confidence, private capital availability could dry up, shifting the funding burden back to the federal government at a scale beyond current commitments.

If this assumption fails: Federal capital commitment would need to increase beyond the current \$800–900 million envelope; loan guarantee utilization would likely increase; vendor consolidation (two or three survivors rather than five to six active developers) would occur. Federal strategy should maintain DOE Loan Programs Office authority as a backstop contingency even if direct grants are the primary instrument.

Open Gaps and Recommended Next Steps for the Consultant

GAP_001: Vendor-Specific Burn Rates and Cash Runway Duration

Status: ACTIVE | Confidence in recommendation without this data: 52%

The federal grant timing recommendation (milestone tranche alignment with vendor cash cycles) cannot be precisely designed without knowing vendor monthly burn rates and actual runway duration for NuScale, Holtec, X-Energy, and key micro-reactor developers. This information may be partially available through SEC filings for

public companies and through DOE funding agreement reporting requirements.

Next Step: Request vendor burn rate disclosures as a condition of the DOE funding agreements. If vendors resist disclosure, require third-party financial auditor certification of runway adequacy as an alternative. This should take 30–60 days.

GAP_002: NRC Review Queue Status for Non-NuScale Designs

Status: ACTIVE | Confidence in Holtec 2027 certification timeline: 49%

The Holtec SMR-300 design certification timeline is assumed at 2027 completion based on DOE selection and stated vendor plans, but the actual NRC review queue position, pending question list, and milestone status are not in the knowledge base. The recommendation for DOE technical assistance to Holtec certification depends on knowing where the bottlenecks in NRC review actually are.

Next Step: Request NRC review status briefing for SMR-300 design certification; identify outstanding safety evaluation questions and estimated resolution timelines; map against Holtec's construction permit application schedule.

GAP_003: Domestic Forging and Vessel Supplier Capacity Utilization and Backlog

Status: ACTIVE | Confidence in manufacturing preparation investment sizing: 48%

The manufacturing preparation grant recommendation (\$50–75 million in Month 0–6; \$75–100 million in Month 6–12 conditional on firm orders) depends on knowing actual supplier capacity utilization rates and current order backlogs. The 2–3 units per year figure cited from Education_1 lacks independent verification and may be outdated or misattributed.

Next Step: Commission a 30-day manufacturing capacity audit covering the primary domestic nuclear-grade pressure vessel and major component fabricators — specifically Babcock & Wilcox, JSW Steel US, and any other active nuclear-qualified fabricators. The audit should document actual order backlog, utilization rate, tooling availability, qualified workforce headcount, and earliest available capacity for SMR-sized components.

GAP_004: Micro-Reactor Customer Pipeline and Demand Visibility

Status: ACTIVE | Confidence in Track Three sizing: 56%

Track Three's \$50–75 million allocation is based on the assumption that there is a viable customer pipeline for micro-reactors beginning around 2031. The military demand signal is documented, [8] but the number and character of civilian customers (remote mining operations, island communities, industrial campuses) who are willing to commit to first-of-a-kind micro-reactor units at commercially viable prices is unknown.

Next Step: Commission a demand characterization study for micro-reactor applications, focused on customer pipeline qualification: which customers have made purchase commitments or written letters of intent, and at what price per kilowatt-hour or per kilowatt of capacity?

GAP_005: State-Level Permitting and Grid Interconnection Constraints by Deployment Site

Status: ACTIVE | Confidence in full deployment timeline absent this data: 45%

As described throughout the report, this is the highest-priority gap. Grid interconnection feasibility for the NuScale military base deployment and the Holtec Palisades deployment is not documented in the knowledge base and must be resolved before any sequencing decision is finalized.

Next Step: Immediately engage the relevant grid operators (NERC, MISO, and relevant regional operators) to obtain current interconnection queue status and transmission capacity assessment for both sites. If no interconnection application has been filed, file one immediately and simultaneously begin evaluating alternative site options that may have pre-existing transmission capacity.

What to Verify Before Delivery

The consultant must verify or complete the following actions before delivering this report to their client. These are not optional polish — they are prerequisites to defensible advice.

First, confirm the current deployment site or candidate sites for the NuScale military base deployment. The 2028 deadline mandated by Executive Order 14299 is the organizing event for Track One of this strategy, but the specific installation has not been publicly identified in sources available to this analysis. If the site is unresolved, this report's Track One recommendations cannot be implemented. If the site is resolved, verify that grid operator engagement has begun.

Second, verify the Holtec SMR-300 design certification status with DOE or NRC directly. The knowledge base confirms Holtec's selection and funding commitment [21][66][67] but does not provide current NRC review milestone status. If design certification is significantly behind schedule (more than six months behind a 2027 target), the Track Two recommendations must be revised to reflect a 2030–2031 Palisades deployment rather than 2029–2030.

Third, obtain a HALEU supply confirmation for X-Energy. Before including X-Energy in any client-facing deployment roadmap as a 2028–2030 candidate, the consultant should have direct confirmation from Centrus and X-Energy on production schedules and fuel supply contract status. The THRESHOLD rating on HALEU supply means this is genuinely uncertain, and client expectations should be calibrated accordingly.

Fourth, verify the political durability of the DOE SMR funding commitments in the current budget environment. The \$800–900 million commitment [25][26][28][66][67] was established in late 2025; the FY2026 and FY2027 appropriations environment may affect disbursement schedules. The consultant should confirm with DOE that the funding commitment is appropriated (not merely authorized) for the relevant fiscal years.

Fifth, confirm that this report's sensitivity analysis assumptions have been shared with the client before the recommendations are presented. Specifically, the client should understand that the "meaningful commercial deployment by 2030" outcome at medium confidence (55%) is contingent on grid interconnection being available (the most fragile assumption), that NuScale's 2028 timeline is the primary anchor of the strategy, and that micro-reactor deployment by 2030 is not achievable based on current regulatory timelines.

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Appendix: Decision Log

Goal: Sequence federal investment, regulatory action, and supply chain coordination over 18 months to maximize probability of meaningful U.S. SMR commercial deployment by 2030, with specific focus on bottleneck prioritization, vendor capital allocation, and micro-reactor vs. larger SMR strategy

David version: strategic-v1.4 Timestamp: May 2026 Submitter: Boutique Energy Strategy Practice Consultant Client: Federal Energy Policy Principal / Senior Strategy Decision-Maker Decision deadline: 18-month action window; September 2028 hard mandate deadline (NuScale military deployment) Intent confidence: 91%

Assumption flags: 1. Grid interconnection available or achievable for primary deployment sites (FRAGILE — HIGH) 2. Holtec SMR-300 design certification completes 2027 (FRAGILE — MEDIUM) 3. NuScale military mandate survives policy environment (FRAGILE — LOW-MEDIUM) 4. Manufacturing capacity can expand to 4–5 units/year by 2029 with capital injection (FRAGILE — MEDIUM; underlying data unverified) 5. Private capital continues to flow through 2028 (FRAGILE — LOW-MEDIUM)

Real-time data gathered: Yes (8 web searches, May 2026) Knowledge items processed: 8 (web search results), 3 (domain expertise/education modules) External sources cited: 70 (Citation Manifest, [1] through [70])

Causal filter summary: CAUSAL: 3 findings (design certification determines 2028–2030 deployment window; micro-reactor deployment cannot occur before 2029–2031; three-track parallel structure as preferred configuration) MECHANISM: 3 findings (manufacturing capacity as preparation constraint; vendor capital runway risk; manufacturing sequencing following firm orders) THRESHOLD: 2 findings (HALEU fuel supply binding constraint for near-term window; grid interconnection capacity at primary deployment sites) CORRELATED: 2 findings (vendor funding size vs. commercialization speed; linear bottleneck sequencing framework as universal model — both DISCARDED from recommendation basis) NOISE: 0

SPM verification: Agreements — 1 | Overrides — 5

Override detail: (1) Manufacturing capacity from MECHANISM/IMMINENT to MECHANISM/CONDITIONAL; (2) Design certification confidence from 90% to 70% due to mandate conflation; (3) HALEU supply from MECHANISM/LEANING CAUSAL to THRESHOLD; (4) Grid integration priority elevated from contingency to Month 0 action; (5) Bottleneck sequencing from universal linear framework to vendor-specific parallel model.

Extrapolations applied: 5 (all at MECHANISM level — manufacturing capacity mechanism, vendor cash flow timing, certification prerequisite causation, grid operator timeline, fuel supply chain path) Outliers applied: 0

Edge cases applied: 0

Overall confidence in central recommendation: 65% Overall confidence in 2028 NuScale deployment feasibility: 75% (contingent on grid and site confirmation) Overall confidence in 2029–2030 Holtec Palisades deployment: 65% (contingent on certification progress) Overall confidence in meaningful commercial deployment at scale by 2030 (3+ units): 55%

Open gaps: GAP_001 — Vendor-specific burn rates and cash runway duration (confidence impact: 52%) GAP_002 — NRC review queue status for non-NuScale designs (confidence impact: 49%) GAP_003 — Domestic forging/vessel supplier capacity utilization and backlog data (confidence impact: 48%) GAP_004 — Micro-reactor customer pipeline and demand visibility (confidence impact: 56%) GAP_005 — Grid interconnection constraints by deployment site — CRITICAL SHOW-STOPPER RISK (confidence impact: 45%)

Human review required before delivery: YES.

The five active data gaps collectively affect the recommendation's defensibility. No portion of this analysis should be presented to a client without first resolving GAP_005 (grid interconnection) and GAP_002 (Holtec certification status). These two gaps have the greatest potential to invalidate the current sequencing recommendation in its entirety.