

**DOUG TRUE**

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March 5, 2020

Mr. Ho Nieh  
Director, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** NEI Recommendations for Streamlining Environmental Reviews for Advanced Reactors

**Project Number: 689**

Dear Mr. Nieh:

The purpose of this letter is to request the U.S. Nuclear Regulatory Commission's (NRC's) consideration of Nuclear Energy Institute's (NEI)<sup>1</sup> *Recommendations for Streamlining Environmental Reviews for Advanced Reactors*. The report was written to identify opportunities to streamline environmental reviews for advanced reactors in recognition of the very small potential impacts expected for these types of design.

Much has changed since the time when the NRC established requirements and guidance for the environmental review of new reactors. There has been a significant amount of experience gained and lessons learned associated with the operation of nuclear reactors and the licensing of new reactors. As a result, there is a better understanding of the potential environmental impacts of nuclear reactors and that they are much lower than previously assumed. In addition, recognition of nuclear energy's environmental benefits through their avoidance of CO<sub>2</sub> emissions continues to grow. Broader efforts, such as the *Fixing America's Surface Transportation Act (FAST-41)*, are causing agencies to reevaluate their implementation of the statutory requirements in the *National Environmental Protection Act (NEPA)*. As the NRC prepares to receive license applications for advanced reactors, it is an opportune time to reassess the NRC's requirements, guidance and process for environmental reviews.

The NEI report contains six recommendations that if implemented would streamline the NRC's environmental reviews in compliance with NEPA and Council on Environmental Quality (CEQ) regulations. These include recommendations that have been identified by others and are being considered by the NRC, such as the use of a Generic Environmental Impact Statement. Current NRC regulations require that an Environmental Impact Statement (EIS) be developed for virtually all new siting, construction, and operation

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

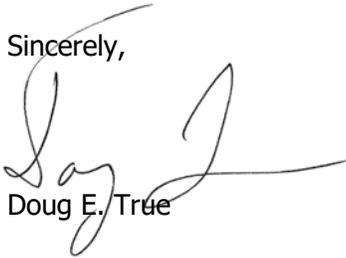
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applications. The existing regulations do not account for the environmental benefits of nuclear energy or the inherent safety of advanced reactor designs that can lead to reduced use of materials and land, use of brownfield sites, reduced source terms, and the potential for reduced generation of spent nuclear fuel. For these reasons, it is important to consider efficiencies in the environmental review process now, as advanced nuclear energy designs provide increased opportunities for providing power to remote locations, process heat for industrial applications, and integration with renewables.

NEI would like to work with the NRC to implement these recommendations and to identify additional opportunities to streamline environmental reviews to be more proportionate or advanced reactor designs. We look forward to discussing these approaches and any additional actions to develop additional information.

If there are any questions on this matter, please contact Kati Austgen, at (202) 739-8068 or [kra@nei.org](mailto:kra@nei.org), or me.

Sincerely,



Doug E. True

Attachment

c: Robert Taylor, Deputy Director for New Reactors, NRR  
John Monninger, Director, Division of Advanced Reactors and Non-Power Production and Utilization Facilities, NRR  
John Segala, Branch Chief, Advanced Reactor Policy, NRR/DANU  
Benjamin Beasley, Branch Chief, Advanced Reactor Licensing, NRR/DANU  
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NRC Document Control Desk