

**SIGNIFICANT ISSUES RAISED DURING THE PUBLIC SCOPING PERIOD FOR
THE REVIEW AND POTENTIAL UPDATE OF THE “GENERIC ENVIRONMENTAL IMPACT
STATEMENT FOR LICENSE RENEWAL OF NUCLEAR PLANTS” (NUREG-1437)**

The U.S. Nuclear Regulatory Commission (NRC) published a notice in the *Federal Register*, ([85 FR 47252](#)) on August 4, 2020, initiating the scoping process to solicit public input on the review of NUREG-1437, “Generic Environmental Impact Statement for License Renewal of Nuclear Plants,” Revision 1, issued June 2013 (LR GEIS). The staff received 5 comment letters, in addition to comments received during the public scoping meetings, for a total of 26 comments. Most of the comments received were from the Nuclear Energy Institute (NEI). Other commenters included the U.S. Environmental Protection Agency and three American Indian Tribes. The staff has developed the scoping summary report (Agency Documents Access and Management System Accession No. ML21039A574). The following is a high-level summary of comments and proposals received during public scoping.

Comments included support for the NRC’s proposal to clarify that the LR GEIS and Table B–1, “Summary of Findings on NEPA [National Environmental Policy Act] Issues for License Renewal of Nuclear Power Plants,” in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51, “Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions,” Subpart A, “National Environmental Policy Act—Regulations Implementing Section 102(2),” Appendix B, “Environmental Effect of Renewing the Operating License of a Nuclear Power Plant,” apply to subsequent license renewal environmental reviews. Comments also suggested that the applicability should be reflected in both the LR GEIS and 10 CFR Part 51, consistent with the Commission’s determination in Commission Memorandum and Order CLI-20-03, dated April 23, 2020.

A commenter questioned whether it is the appropriate time to incorporate the following changes the NRC had listed in the public scoping notice:

- Include advanced nuclear reactors and small modular reactors in the LR GEIS update. The commenter suggested that the NRC complete the Advanced Nuclear Reactor GEIS and defer including small modular reactors until the next 10-year review.
- Include large, light-water reactors permitted for construction after June 30, 1995, in the LR GEIS update. The commenter suggested that the NRC defer this change since Vogtle Electric Generating Plant, Units 3 and 4, would not have accrued enough operating experience and the licensee would not seek renewal for at least another two decades.
- Include consideration of the environmental impacts of license renewal beyond the current 20-year renewal term in the LR GEIS update and the rule. The commenter suggested this consideration may be premature given that the staff in the Office of Nuclear Reactor Regulation is in the early stages of evaluating this possibility.

Other commenters encouraged the NRC to consider the Council on Environmental Quality’s rule changes ([85 FR 43304](#)) in the context of the agency’s broader efforts to enhance and streamline its environmental reviews. Commenters also recommended that the NRC evaluate changes to aquatic systems over time (e.g., changes in water volume, seasonal flow, and water temperatures). Commenters also recommended reevaluating the potential environmental impacts on water quality and water levels related to thermal discharges and rising temperatures

so that hydrologic alteration can be evaluated generically. Several commenters supported revisions to interagency consultations on threatened, endangered, and protected species and essential fish habitat if interagency consultations do not include State-listed species.

One commenter supported updating the LR GEIS to incorporate the U.S. Department of Energy's Standard 1153-2019, "A Graded Approach to Evaluating Radiation Doses to Aquatic and Terrestrial Biota." The commenter also supported incorporating NEI guidance, NEI 17-04, Revision 1, "Model SLR New and Significant Assessment Approach for SAMA" (November 12, 2019), in Regulatory Guide 4.2, Supplement 1, Revision 1, "Preparation of Environmental Reports for Nuclear Power Plant License Renewal Applications," issued June 2013. One commenter opposed the use of generic analyses to evaluate environmental impacts to sacred land, air, and water quality, all of which the commenter considered components of the cultural environment.