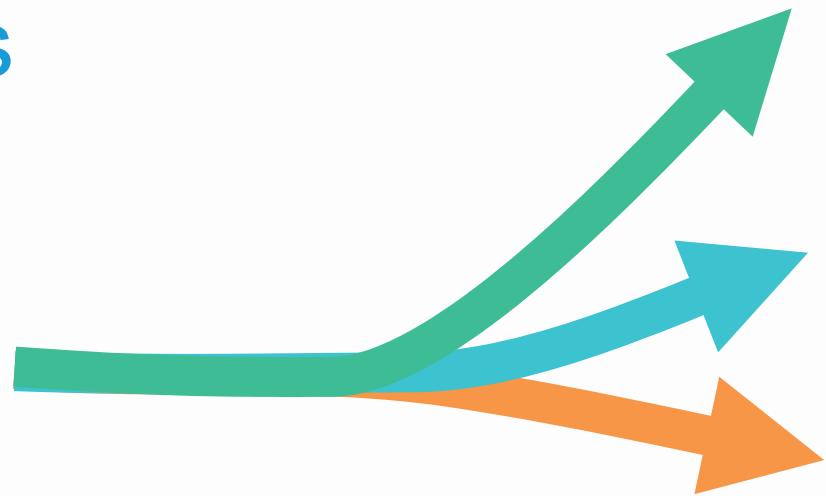


Industry Perspectives on Part 53

Doug True
Sr. Vice President and Chief Nuclear Officer
Nuclear Energy Institute

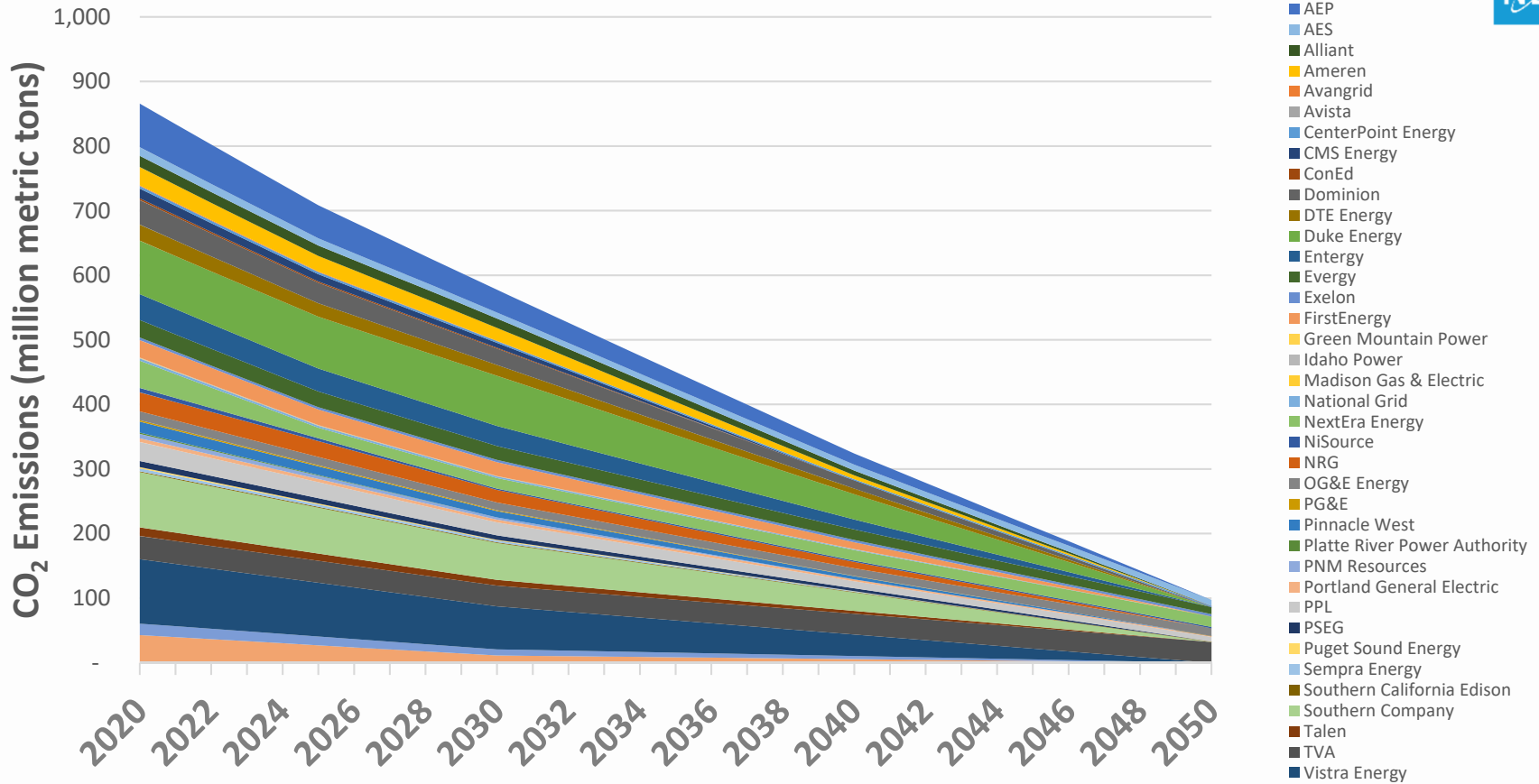
NRC Commission Briefing



July 21, 2022

Context

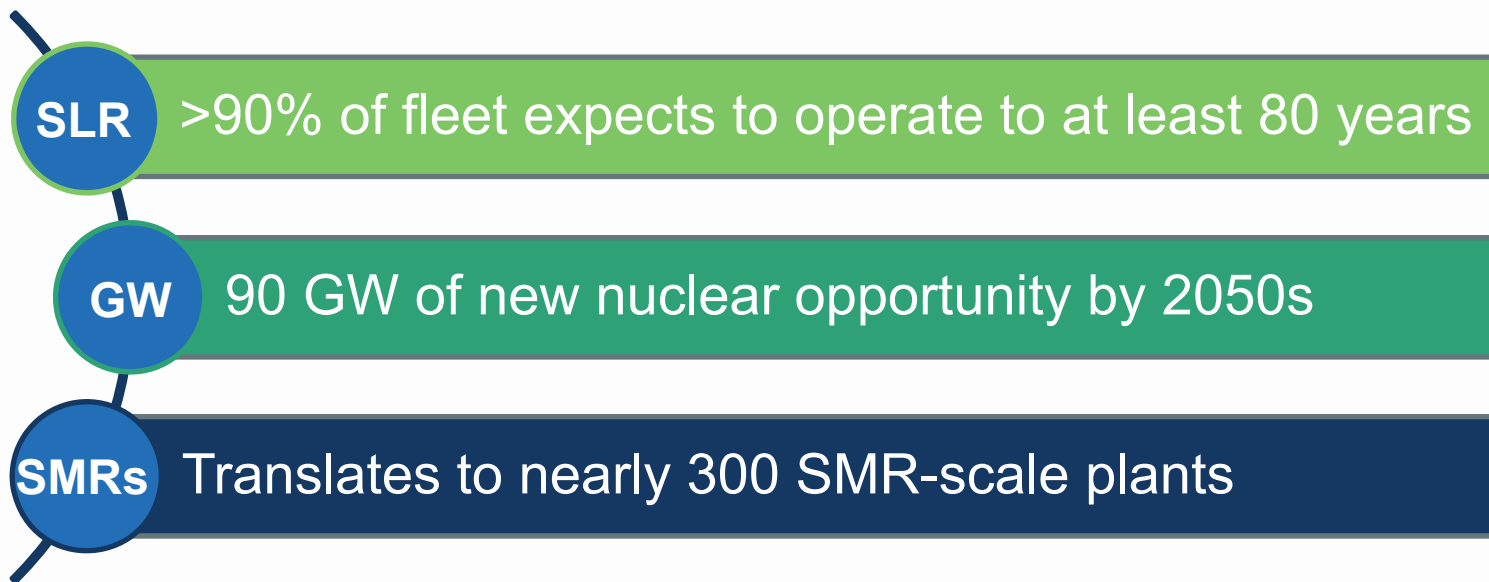
Utility Carbon Emission Commitments



Source: ABB Velocity Suite, U.S. Environmental Protection Agency, utility press releases.

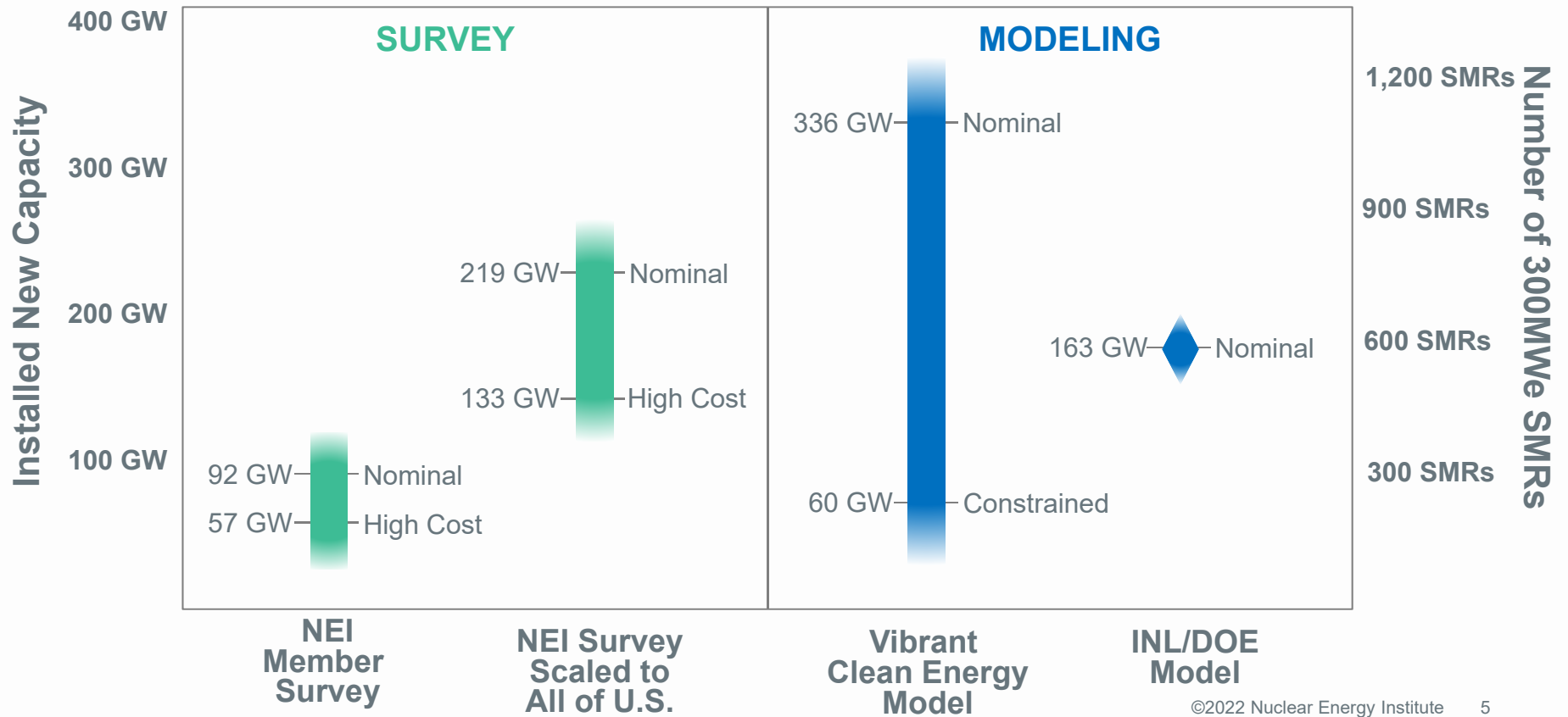
Recent Survey of NEI's U.S. Utilities

Nuclear power's potential role in meeting their company's decarbonization goals:



* - NEI utility member companies produce nearly half of all US electricity

Triangulating on Nuclear Demand – Grid Only



Progress on Part 53

Progress to Date

- NRC Staff should be commended for commitment to Commission schedule and efforts to keep stakeholders informed on Staff direction
 - Industry continues to desire NRC address major concerns regarding viability
- Inclusion of efficient alternative approaches is essential
 - Insufficient time to fully assess “Framework B”, but currently it appears to not be technology-inclusive or performance-based, and unlikely to result in fewer exemptions than Parts 50/52
- Industry feedback indicates that additional burden in Part 53, that does not enhance safety, makes it less desirable than Part 50/52

An unused Part 53 will not help meet our decarbonization objectives

Key Commission Decisions Ahead

- What is best course to a Part 53 that will be used?
- Does Part 53 achieve the needed efficiency?
- Would a single framework, consistent with industry recommendations, be easier and quicker to develop?
- Does Part 53 appropriately reduce burden on plants that can be shown to be substantially safer?
- Does Part 53 facilitate or limit the export of U.S. technologies?
- How will industry concerns on key open policy issues be addressed?
 - QHOs in Regulation, Facility Safety Program, ALARA, etc.