

**RULEMAKING ISSUE**  
**NOTATION VOTE**

**RESPONSE SHEET**

**TO:** Brooke P. Clark, Secretary  
**FROM:** Chair Hanson  
**SUBJECT:** SECY-22-0109: Proposed Rule - Renewing Nuclear Power Plant Operating Licenses - Environmental Review

Approved  X  Disapproved       Abstain       Not Participating      

**COMMENTS:** Below       Attached  X  None      

**Entered in STAR**

Yes  X   
No      

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**Signature**  
**Christopher T. Hanson**

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**Date** **12/20/2022**

**Chair Hanson's comments on SECY-22-0109:  
Proposed Rule: Renewing Nuclear Power Plant Operating Licenses – Environmental  
Review**

I continue to be impressed with the staff's work on updating the License Renewal (LR) Generic Environmental Impact Statement (GEIS) to account for subsequent license renewal (SLR) in accordance with the Commission's direction in SRM-SECY-21-0066 and SRM-SECY-22-0024. The updates to the LR GEIS are thoughtful and pointed, assuring the agency fulfills its statutory obligations while maintaining an ambitious rulemaking schedule.

It is incumbent upon us to ensure that compliance with the National Environmental Policy Act is complete and transparent. To that end, I approve the staff's issuance of the LR GEIS and publication of the proposed rule in the *Federal Register*, but I do not approve the extension of the GEIS's scope to cover *any* potential future term of SLR.

The LR renewal GEIS accounts for an initial term of license renewal and the staff's review should only expand the scope of the GEIS to cover one term of SLR, or a 60- to 80-year operating period. Consideration of this term reflects the licensing needs of currently operating plants and our growing knowledge about continued operation.

The NRC's regulatory framework for renewal anticipates that the LR GEIS will be reviewed and updated every ten years to account for new information and lessons learned. It is at this ten-year review that it is most appropriate to consider whether the scope of the LR GEIS should be expanded to cover additional terms of license renewal beyond the first SLR.

It benefits the agency and the public it serves to use the ten-year review cycle of the LR GEIS as designed—to evaluate and incorporate new information gleaned from experience to generically address known impacts of continued operation. Therefore, the NRC staff should modify the proposed rule and draft GEIS to explicitly state that the scope of the GEIS is initial license renewal and one term of subsequent license renewal.