



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

May 16, 2023

SECRETARY

MEMORANDUM TO: David Skeen, Director  
Office of International Programs

FROM: Brooke P. Clark, Secretary

SUBJECT: STAFF REQUIREMENTS – SECY-23-0029 – RULEMAKING  
PLAN FOR THE IMPLEMENTATION OF CHANGES TO  
REFLECT ADVANCED REACTOR EXPORT LICENSING  
CONSIDERATIONS

The Commission has approved the staff's recommended Alternative 3, the initiation of a rulemaking to revise Part 110 of Title 10 of the *Code of Federal Regulations*, "Export and Import of Nuclear Equipment and Material," in order to incorporate clarifying changes on advanced reactor concepts into the NRC's regulations governing the export of nuclear reactor equipment and materials.

The staff should consider additional proposed changes to Appendix A of Part 110 to reflect items such as control drums or other novel equipment used for reactivity control in advanced reactors.

For certain advanced reactor designs, the term "reactor pressure vessel" is expected to be replaced with "reactor vessel" to reflect the differences in design and operating conditions (e.g., sodium fast reactors). As part of the proposed rule, the staff should consider whether including the term "pressure" in Appendix A item 1 is appropriate and whether Appendix A item 5 should also be modified to capture this different nomenclature to ensure that the requirements are technology inclusive.

Finally, as part of the proposed rule, the staff should ensure that there is clarity regarding whether salt as a coolant should be governed by § 110.9 as nuclear material or as a component under § 110.8.

cc: Chair Hanson  
Commissioner Baran  
Commissioner Wright  
Commissioner Caputo  
Commissioner Crowell  
EDO  
OGC  
CFO  
OCA  
OPA  
ODs, RAs, ACRS, ASLBP  
PDR