

# PUBLIC SUBMISSION

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Environmental Evaluation of Accident Tolerant Fuels with Increased Enrichment and Higher Burnup Levels

**Comment On:** NRC-2023-0113-0001

Draft NUREG: Environmental Evaluation of Accident Tolerant Fuels With Increased Enrichment and Higher Burnup Levels

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## General Comment

Please ensure you address the reduced environmental impacts from fuel that reduces the overall risk of the reactor. By being more accident tolerant, the fuel is less likely to negatively impact the environment. The licensee should be able to adjust their actions and requirements based on the reduced risk. This could mean relaxing certain requirements, such that the net effect is the same environmental risk as before. This flexibility and consideration should be built into the rule making.