

# PUBLIC SUBMISSION

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**Docket:** NRC-2020-0101

Generic Environmental Impact Statement for Licensing of New Nuclear Reactors (formerly Advanced Nuclear Reactor Generic Environmental Impact Statement)

**Comment On:** NRC-2020-0101-0134

Generic Environmental Impact Statement for Licensing of New Nuclear Reactors

**Document:** NRC-2020-0101-DRAFT-0169

Comment on FR Doc # 2024-22385

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## Submitter Information

**Email:** sowen@publicpower.org

**Organization:** American Public Power Association

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## General Comment

See attached file(s)

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## Attachments

APPA NRECA EEI NRC GEIS New Nuclear Comment Letter (Docket NRC-2020-0101)



December 18, 2024

Carrie M. Safford  
Secretary  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

RE: NRC-2020-0101

Dear Secretary Safford:

On behalf of the American Public Power Association (APPA), National Rural Electric Cooperative Association (NRECA), and Edison Electric Institute (EEI), we are writing in support of the Nuclear Regulatory Commission's (NRC) proposal to amend the regulations that govern its environmental reviews of new nuclear reactor applications under the National Environmental Policy Act, the "Generic Environmental Impact Statement for Licensing of New Nuclear Reactors" (NR-GEIS) (Docket ID NRC-2020-0101).<sup>1</sup>

As representatives of public power, cooperative, and investor-owned utilities throughout the United States and its territories, we recognize that a robust U.S. nuclear energy sector is critical to providing communities across the country with around-the-clock, emissions-free electricity that is integral to ensuring grid stability, reliability, and affordability. We recognize that nuclear energy will continue to play a key role in the energy resource mix going forward, including to help our members and communities across the country reach emissions-reduction goals.

We appreciate recent steps taken by Congress and the administration to expedite the regulatory process for new nuclear reactors, like the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy (ADVANCE) Act [Public Law No. 118-67]. The ADVANCE Act seeks to improve the efficiency and timeliness of licensing and regulatory timelines for the deployment of new nuclear technologies. The undersigned are particularly supportive of certain sections of the ADVANCE Act, such as Section 206, which will better facilitate the licensing of nuclear facilities at brownfield and retired fossil fuel sites.

We applaud the NRC's efforts to reform environmental impact statement (EIS) procedures via the proposed amendments to 10 CFR part 51. As the NRC notes in the proposed rule, these are

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<sup>1</sup> 89 Fed. Reg. at 80,797 (October 4, 2024).

the most complex and resource-intensive environmental reviews the agency performs. We believe these proposed reforms will significantly reduce regulatory and licensing timelines for new nuclear reactors, supporting the availability of an affordable energy source for American consumers.

We also encourage the NRC to codify the generic conclusions of the draft NR GEIS. As noted in the proposed rule, applying the Category 1 issues identified in the NR GEIS to new nuclear reactor applications that will have a small environmental impact will allow for generic impact analyses for the environmental issues common to many new reactors, reducing extensive and potentially redundant review processes for new nuclear reactors. We believe this will be vital in helping many of our members, especially those with limited staffing resources, address regulatory requirements and embrace new nuclear technologies to help their communities reduce emissions and provide affordable and reliable energy. We encourage the NRC staff to rely on the NR GEIS in all applications, without requiring the applications to reference the NR GEIS, unless there are specific facts in the applications that indicate application of the NR GEIS would be inappropriate. The NRC should state this plainly and clearly in the rule.

In line with the NRC's goals as directed by the ADVANCE Act, we recommend the NRC recategorize the "Historic and Cultural Resources" section of the NR GEIS to Category 1. The NRC should assume the impact of both construction and operation on historic and cultural resources is small, unless otherwise indicated during the notice and comment period for approval of the construction and operation applications.

We appreciate the NRC's willingness to consider input from key industry stakeholders and encourage the commission to swiftly adopt these much-needed reforms.

Cordially,

American Public Power Association  
National Rural Electric Cooperative Association  
Edison Electric Institute

APPA is the national trade organization representing the interests of the nation's 2,000 not-for-profit, community-owned electric utilities. Public power utilities are in every state except Hawaii. They collectively serve over 54 million people in 49 states and five U.S. territories, and account for 15 percent of all sales of electric energy (kilowatt-hours) to end-use consumers. Public power utilities are load-serving entities, with the primary goal of providing the communities they serve with safe, reliable electric service at the lowest reasonable cost, consistent with good environmental stewardship. This orientation aligns the interests of the utilities with the long-term interests of the residents and businesses in their communities.

NRECA is the national trade association representing nearly 900 local electric cooperatives and other rural electric utilities. America's electric cooperatives are owned by the people that they serve and comprise a unique sector of the electric industry. From suburbs to remote farming communities, electric cooperatives power 1 in 8 Americans and serve as engines of economic development for 42 million Americans across 56 percent of the nation's landscape.

EI is the association that represents all U.S. investor-owned electric companies. Our members provide electricity for nearly 250 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States.