

July 3, 2025

Mr. Michael King
Acting Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI Suggestions on Prioritizing Completion of Certain Ongoing Rulemakings

Dear Mr. King:

The Nuclear Energy Institute (NEI)¹, on behalf of its members, would like to offer suggestions related to the NRC's initiative to conduct a comprehensive review and revision of its regulatory framework. NEI supports the agency's commitment to reducing unnecessary burden and enhancing the clarity of its regulations, which will accelerate the increase in U.S. commercial nuclear power capacity to help meet the nation's energy reliability and security goals.

As the NRC begins the comprehensive rulemaking process, we recommend the NRC consider completing certain ongoing rulemakings outside of this broader effort so that significant benefits for both the NRC and the industry can be realized sooner.

Specifically, NEI recommends the following rulemakings be prioritized for completion:

- Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning
- Alternatives to the Use of Credit Ratings
- Harmonization of Transportation Safety Requirements with International Atomic Energy Agency Standards
- Advanced Nuclear Reactor Generic Environmental Impact Statement

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

- Licensing Requirements for Land Disposal of Radioactive Waste

These rulemakings address important matters that have undergone significant stakeholder engagement, are mature regulatory products and can be completed before the comprehensive rule is finalized in November 2026.

We appreciate the agency's openness to stakeholder input and look forward to ongoing dialogue as the broader regulatory review proceeds.

Please contact me should you have any questions or require additional information.

Sincerely,



Jennifer Uhle
Vice President

cc: Commissioner Annie Caputo, Nuclear Regulatory Commission
Commissioner Bradley Crowell, Nuclear Regulatory Commission
Commissioner Matthew Marzano, Nuclear Regulatory Commission
Ms. Brooke Poole Clark, Office of the General Council
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