

# PUBLIC SUBMISSION

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**Docket:** NRC-2026-0760

Draft Interim Staff Guidance: NRC License Application Pathway for Streamlined Reviews of Proven Reactor Designs

**Comment On:** NRC-2026-0760-0001

Draft Interim Staff Guidance: NRC Application Pathway for Reactor Designs Previously Authorized by U.S. Department of Energy or Department of War

**Document:** NRC-2026-0760-DRAFT-0030

Comment on FR Doc # 2026-07566, NRC-2026-0760-0001, from Saskia Hostetler Lippy

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## General Comment

I am writing in opposition to Interim Staff Guidance DANU-ISG-2026-XX, Docket ID NRC-2026-0760. Independent NRC safety review cannot be reduced to blanket deference to secret DOE or DOW authorizations.

I incorporate by reference and adopt as my own the comments submitted to this docket by Fred Schofer, former and now retired NRC Regulatory Analysis Team Lead. He cites 19 formal deficiencies in this new guidance including the following: 1) All ten appendices instruct NRC staff to defer to DOE or DOW authorization "to the maximum extent practical" with no evidentiary threshold and no methodology for determining when secret information is sufficient. 2) Part 53, the new advanced nuclear reactor licensing framework that took effect April 29, 2026 and is the most likely licensing pathway for the companies this rule was designed for, has been completely omitted from the guidance. 3) There is no framework for AI-generated license applications. In March 2026 DOE demonstrated using artificial intelligence to convert a DOE safety document into a 208-page NRC license application in 24 hours. Neither the rule nor the ISG requires disclosure of AI use or any quality assurance for AI-generated content. 4) Several pilot program nuclear reactors use high-assay low-enriched uranium TRISO fuel (HALEU TRISO) enriched up to 20% which is four times higher than standard commercial nuclear reactor fuel. Fuel qualification data from a prototype-scale nuclear reactor does not automatically transfer to a larger commercial design and the ISG provides no guidance on this. 5) One appendix contains a blank section where a required legal analysis should appear with a placeholder reading "discussion to be provided in final ISG."

I request that this guidance be withdrawn and reissued after proper public notice-and-comment. The public is watching these new proposed NRC pathways and we will not be silent about the danger they present to the public, most especially in the lack of AI oversight and policy.