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Comment On: NRC-2026-2906-0001

Orano Enrichment USA LLC; Uranium Enrichment Facility; Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement

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Comment on FR Doc # 2026-11785, NRC-2026-2906-0001, from United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the U.S. and Canada

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General Comment

Please see the attached comments submitted on behalf of the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada, AFL-CIO.

Attachments

UA Comments to NRC re Orano Project 7-13-26



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July 13, 2026

VIA ONLINE PORTAL

The Honorable Ho K. Neigh
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Notice of Intent to Conduct Scoping Process and Prepare an Environmental Impact Statement for the Proposed Orano Enrichment USA, LLC Uranium Enrichment Facility (Docket No. NRC-2026-2906)

Dear Chairman Neigh:

These comments are submitted on behalf of over 400,000 hardworking members of the United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry of the United States and Canada, AFL-CIO ("UA" or "United Association"), in response to the U.S. Nuclear Regulatory Commission's ("NRC" or "Commission") request for comments regarding the scoping process for the proposed Orano Enrichment USA, LLC IKE uranium enrichment facility in Roane County, Tennessee (hereinafter, the "Project") in preparation of an Environmental Impact Statement ("EIS") for the Project (the "Notice of Intent" or "NOI"). The UA appreciates the opportunity to submit these comments on the NRC's NOI. The Commission specifically requested input regarding the scope of the environmental review, including significant issues that should be analyzed in the EIS and information that would assist the NRC in preparing the analysis.¹

I. Relevant Background and Benefits of Domestic Enrichment

The Commission should recognize the broader federal policy context in which the Project is being considered, including current federal initiatives to rebuild the domestic nuclear fuel cycle and strengthen the United States' nuclear industrial base. The President has directed the federal government to strengthen domestic uranium conversion, enrichment, fuel fabrication, and related capabilities to restore a secure domestic nuclear fuel supply.²

Likewise, he has recognized the importance of expanding domestic nuclear capabilities while modernizing the regulatory framework needed to support the responsible and timely deployment of

¹ Orano Enrichment USA LLC; Uranium Enrichment Facility; Notice of Intent To Conduct Scoping Process and Prepare Environmental Impact Statement, 91 Fed. Reg. 35,584 (June 11, 2026) ("Notice of Intent").

² Executive Order No. 14,302, 90 Fed. Reg. 22,595 (May 29, 2025).





nuclear technologies.³ These directives promote a robust and steadfast national policy recognizing the importance of a resilient domestic nuclear fuel cycle to our Nation's energy security, economic competitiveness, and national security.

The objective of this policy is well-founded. For decades, the U.S. experienced little growth in electricity demand, but that era has now ended: recent forecasts project sustained, significant increases in demand driven by domestic manufacturing, artificial intelligence, data centers, and other energy-intensive industries.⁴ At the same time, regions nationwide have retired large amounts of controllable generation while shifting toward weather-dependent resources, weakening the grid's ability to dynamically respond to increases in demand.⁵ Although every generating resource contributes to the nation's energy grid, maintaining grid reliability requires sufficient firm generation that can operate regardless of weather conditions.⁶

Expanding nuclear generation, however, requires more than reactors alone. It also requires a reliable domestic fuel supply chain. Uranium enrichment is an indispensable component of the nuclear fuel cycle, and expanding domestic enrichment capacity reduces reliance on foreign suppliers, strengthens supply-chain resilience, and supports both current reactors and the development and deployment of advanced nuclear technologies. The Project, therefore, represents more than a single industrial development; it has the potential to serve as an important component of the domestic nuclear fuel infrastructure that advances the President's stated energy and national security objectives.

The Project also represents a substantial economic investment. According to Orano Enrichment USA, the Project is an approximate \$5 billion investment that is expected to create roughly 1,000 construction jobs and around 300 permanent operating positions.⁷ In addition to these direct jobs, projects of this scale spur substantial indirect economic activity for contractors, suppliers, service providers, and local businesses.

³ See Executive Order No. 14,300, 90 Fed. Reg. 22,587 (May 29, 2025); Executive Order No. 14,299, 90 Fed. Reg. 22,581 (May 29, 2025).

⁴ See Robert Walton, *US annual electricity consumption to grow 55% by 2050: NEMA*, UTILITY DIVE (May 13, 2026), <https://www.utilitydive.com/news/us-annual-electricity-consumption-data-centers-nema/820112/>; *Long-Term Reliability Assessment*, N. AM. ELECTRIC RELIABILITY CORP. at 9, 26 (Jan. 2026), https://www.nerc.com/globalassets/our-work/assessments/nerc_ltra_2025.pdf; Mark Schipper & Tyler Hodge, *After more than a decade of little change, U.S. electricity consumption is rising again*, U.S. ENERGY INFO. ADMIN. (May 13, 2025), <https://www.eia.gov/todayinenergy/detail.php?id=65264>.

⁵ See *Long-Term Reliability Assessment*, N. AM. ELECTRIC RELIABILITY CORP. at 9-10, 16 (January 2026); Katherine Blunt, *America's Power Grid Is Increasingly Unreliable*, WALL STREET JOURNAL (Feb. 18, 2022), <https://www.wsj.com/business/energy-oil/americas-power-grid-is-increasingly-unreliable-11645196772>.

⁶ See generally *Long-Term Reliability Assessment*, N. AM. ELECTRIC RELIABILITY CORP. at 9-10, 16 (Jan. 2026).

⁷ *Orano Selected for U.S. Department of Energy \$900M Energy Security Funding to Produce Low-Enriched Uranium with a New American Uranium Enrichment Facility*, ORANO USA (Jan. 5, 2026), <https://www.orano.group/usa/en/our-news/news-releases/2026/orano-selected-for-DOE-900m-funding-LEU-new-american-uranium-enrichment-facility>.



II. EIS Considerations: Labor and Workforce

As the Commission develops the scope of the draft EIS, it should ensure that the socioeconomic analysis adequately evaluates the labor and workforce implications of constructing and operating the proposed facility. As discussed, the United Association represents highly skilled, well-trained plumbers and pipefitters nationwide—many of whom are employed by contractors with proven experience in delivering complex industrial infrastructure projects—and submits the following recommendations for the Commission’s consideration during the scoping process.

First, in developing the EIS, the Commission should evaluate the Project’s workforce requirements and quantify the socioeconomic benefits associated with developing and maintaining the skilled workforce needed to construct and operate the proposed facility. A project that will employ around 1,000 construction workers over multiple years will likely boost regional labor markets, strengthen apprenticeship programs, grow the local workforce, enhance workforce mobility, and stimulate local economic activity for broad public benefit.

Second, the Commission should evaluate the relationship between workforce qualifications and construction quality on projects involving highly complex and specialized industrial facilities. Commercial uranium enrichment facilities require exceptionally precise workmanship and uncompromising quality assurance. Successful project execution depends on experienced craft professionals who can consistently meet demanding engineering specifications while maintaining a strong safety culture throughout construction.

Third, the draft EIS should also evaluate workforce development practices—including registered apprenticeship programs and jointly administered training programs—as examples of approaches that help ensure the availability of highly skilled craft personnel essential for this project, as well as other nuclear building programs. Nuclear facility construction demands plumbers, pipefitters, electricians, operating engineers, laborers, ironworkers, millwrights, and numerous other skilled crafts whose knowledge is developed through years of structured classroom instruction and supervised on-the-job training. Large infrastructure investments such as this project strengthen these programs by providing invaluable experience for workers in this highly specialized market, thereby facilitating vital workforce development critically needed in this industry.

Fourth, the draft EIS should evaluate the effects of labor-management strategies—including Project Labor Agreements (“PLAs”)—on workforce stability, labor availability, schedule reliability, and the Project’s associated socioeconomic effects. PLAs are an established project-delivery mechanism frequently used to ensure timely, cost-effective delivery of large, technically complex industrial construction projects by promoting workforce stability, coordinating multiple trades, supporting apprenticeship programs, and reducing the risk of labor disruptions.

The relevance of these workforce management strategies is further illustrated by empirical research evaluating their effects on project performance, workforce stability, construction efficiency, and overall project delivery. A recent study by the Independent Project Analysis (“IPA”), an



internationally recognized construction research organization, examined 1,550 construction projects spanning 20 years, comparing final, in-place construction costs on union and non-union projects.⁸

Significantly, the IPA study found that, while union labor costs more, the final, in-place construction costs on union projects were four percent lower than non-union projects.⁹ It also found that union projects were less likely to experience schedule delays and cost overruns.¹⁰ The IPA further stressed that union labor was approximately 14 percent more productive than its non-union counterpart, which the IPA attributed to the greater skill training and project staffing capabilities of the union sector.¹¹

Those findings are relevant. The twin engines that drive superior performance on PLA projects of PLAs are the very same factors identified by the IPA study: the union sector's skill training and project staffing capabilities. These benefits are particularly important on complex nuclear construction, which is among the most technically demanding forms of industrial construction in the industry. This is also the reason the vast majority of nuclear facilities built in the U.S. have been supported by PLAs.

Moreover, skill shortages, excessive turnover, or insufficient trained personnel, which are increasingly common on non-union projects, often result in substantial cost overruns and schedule delays, complicate project execution, and compromise the quality of workmanship that is crucial to both worker and public safety in this industry. Conversely, union hiring halls help to ensure access to a stable, highly trained workforce supporting quality workmanship, efficient project delivery, and an extremely strong safety culture. These considerations are directly relevant to understanding the Project's socioeconomic impacts and benefits, as well as the availability of a qualified workforce capable of constructing the facility in accordance with applicable regulatory and quality-assurance requirements.

Finally, the draft EIS should evaluate the long-term workforce benefits associated with expanding domestic nuclear fuel production. Investment into uranium enrichment facilities and the development of other nuclear facilities not only creates demand for construction workers but also for engineers, technicians, maintenance professionals, manufacturers, and suppliers throughout the nuclear industry. Evaluating these broader workforce effects will provide a more complete understanding of the Project's contributions to regional employment, workforce development and long-term capacity needed of America's domestic nuclear industry.

⁸ Michael McFadden et al., *Quantifying the Value of Union Labor in Construction Projects*, INDEPENDENT PROJECT ANALYSIS, at 6 (Dec. 2022), <https://www.mcaa.org/wp-content/uploads/2023/01/IPA-Study-Quantifying-the-Value-of-Union-Labor-in-Construction-Projects-FINAL.pdf>.

⁹ *Id.* at 2.

¹⁰ *Id.*

¹¹ *Id.* at 8.



III. Conclusion

The proposed Orano Enrichment USA uranium enrichment facility is consistent with current federal policy to strengthen domestic nuclear fuel production, improve energy and national security, and expand the United States' industrial base. It also represents a significant opportunity to invest in America's highly skilled construction workforce and the apprenticeship programs that sustain it.

As the Commission prepares the draft EIS, it should ensure that its socioeconomic analysis appropriately evaluates workforce demand, apprenticeship opportunities, construction labor availability, workforce stability, and the broader economic benefits associated with constructing and operating this important national infrastructure project. Doing so will produce a more complete administrative record, provide a fuller understanding of the Project's socioeconomic impacts and benefits, and assist the Commission in satisfying the National Environmental Policy Act's requirement to take a hard look at the environmental consequences of the proposed action.

Respectfully submitted,

Mark McManus
General President