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Docket: NRC-2026-1453

Level 3 Probabilistic Risk Assessment Project Documentation (Volume 1)

Comment On: NRC-2026-1453-0001

Level 3 Probabilistic Risk Assessment Project Documentation (Volume 1)

Document: NRC-2026-1453-DRAFT-0001

Comment on FR Doc # 2026-10074, NRC-2026-1453-0001, from Nuclear Energy Institute

Submitter Information

Organization: Nuclear Energy Institute

General Comment

See attached file(s)

Attachments

07-17-26_Industry Comments on NRC Draft Report on the Level 3 Probabilistic Risk Assessment (PRA)
Project Docket ID NRC-2026-1453

July 17, 2026

Office of Administration
Mail Stop: TWFN-5-A85
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Attn: Program Management, Announcements, and Editing Staff

Subject: Industry Comments on NRC Draft Report “Level 3 Probabilistic Risk Assessment (PRA) Project, “Volume 1: Summary Report”” [Docket ID NRC-2026-1453]

Project Number: 689

Submitted via Regulations.gov

Dear Program Management, Announcements, and Editing Staff:

On May 20, 2026, the U.S. Nuclear Regulatory Commission (NRC) issued a notice in the Federal Register soliciting comments on the draft report titled “Volume 1: Summary Report” for the Level 3 Probabilistic Risk Assessment (PRA) Project. The Nuclear Energy Institute (NEI)¹ appreciates the opportunity to provide comments on behalf of the nuclear energy industry.

NEI appreciates the substantial effort the NRC has invested over more than a decade to complete the Level 3 PRA Project and the agency's longstanding leadership in advancing risk-informed, performance-based regulation. Over the past four decades, the NRC and the industry have significantly improved both nuclear safety and regulatory efficiency through the use of risk insights and the study reflects these improvements.

The report effectively substantiates earlier NRC work, including NUREG-1935, “State-of-the-Art Reactor Consequence Analyses (SOARCA) Report (November 2012)” and NUREG-2161, “Consequence Study of a

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.

Beyond-Design-Basis Earthquake Affecting the Spent Fuel Pool for a U.S. Mark I Boiling Water Reactor (September 2014)”, and demonstrates that the operating fleet maintains very large margins to the NRC Safety Goals. The project also recognizes the substantial safety improvements achieved through the industry’s implementation of the FLEX strategies, which have reduced core damage frequency by approximately a factor of two. As such, the results provide an important technical basis for the NRC’s modernization initiatives under Executive Order 14300 and the ADVANCE Act, and that the use of risk-informed regulation improves safety and efficiency and should be applied in all areas of NRC’s regulatory process.

We recommend that the report place greater emphasis on the remarkable evolution of PRA methods over the past several decades. NRC-sponsored research has reduced unnecessary conservatism through improved data, analytical methods, and understanding of severe accident phenomena. Recognizing these advances would provide a more complete perspective on how risk-informed regulation has matured and why it has successfully supported both safety and regulatory efficiency.

Consistent with these findings, NEI does not believe that potential future applications alone justify widespread implementation of full-scope Level 3 PRA, multi-unit PRA, or low-power and shutdown PRA for the existing fleet. Even in regulatory frameworks that incorporate consequence metrics, such as 10 CFR Part 53, a Level 3 PRA represents only one of several acceptable approaches for informing risk-informed decisions. Alternative risk assessment methods may provide equivalent or more appropriate insights depending on the application.

Before significant additional NRC or industry resources are committed, a clearly defined regulatory objective should be identified together with a demonstration that the expected safety or regulatory benefits justify the additional technical complexity and resource expenditure.

Accordingly, NEI recommends that the final report emphasize the following key conclusions:

- The project confirms the robust safety margins of the existing operating fleet and reinforces the conclusions of earlier NRC consequence studies.
- The results demonstrate the continuing success of risk-informed, performance-based regulation and support ongoing regulatory modernization through the Wholesale Review Rulemakings.
- The project does not establish a basis for new regulatory expectations requiring full-scope Level 3 PRA for the current operating fleet.
- Level 3 PRA may provide valuable insights for certain advanced reactor technologies, including non-light-water reactors, where such analyses are appropriate but should not be required.

NEI appreciates the NRC staff's commitment to completing this research effort. The results further confirm the exceptional safety performance of the existing fleet while providing additional confidence that the NRC can continue modernizing its regulatory framework using sound, risk-informed principles.

Thank you for the opportunity to provide comments on this draft report. If you have any questions or require additional information, please do not hesitate to contact me at vka@nei.org.

Sincerely,



Victoria K. Anderson

Technical Advisor, Engineering and Risk

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