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BLUECORE

NON-PROPRIETARY VERSION

# USCG-NRC COORDINATION AND JURISDICTIONAL OVERSIGHT

## Nautilus Floating Nuclear Power Plant

BLU-WP-000001 · REVISION 0 · NOVEMBER 2026




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# TABLE OF CONTENTS

List of Tables ..... 4
1. INTRODUCTION AND PURPOSE ..... 6
1.1 Purpose and Distribution ..... 6
1.2 Background ..... 7
1.3 Regulatory Basis ..... 7
2. JURISDICTIONAL BOUNDARY CRITERION ..... 8
2.1 Proposed Criterion ..... 8
2.2 Application to SSC Categories ..... 9
2.2.1 Nuclear-Only SSCs ..... 9
2.2.2 Maritime-Only SSCs ..... 9
2.2.3 Dual-Function SSCs ..... 9
2.3 Accountability Principle ..... 9
3. DUAL-FUNCTION SYSTEMS ..... 11
3.1 Mooring System ..... 11
3.2 Hull Structure ..... 12
3.3 Containment-Hull Interface ..... 13
3.4 Vessel Stability Systems ..... 14
3.5 Security Perimeter ..... 15
3.6 Fire Protection ..... 16
3.7 Shore Power Connection ..... 18
3.8 Seawater Cooling and Ultimate Heat Sink ..... 19
3.9 Heating, Ventilation, and Air Conditioning ..... 20
3.10 Electrical Power Distribution ..... 20
3.11 Bilge, Ballast, and Flooding Protection ..... 21
3.12 Personnel Access and Emergency Egress ..... 22
3.13 Crane and Refueling Systems ..... 23
3.14 Fuel Oil Storage and Supply ..... 23
4. COORDINATION PROTOCOL ..... 25
4.1 Interface Document ..... 25
4.2 Joint Review Meetings ..... 25
4.3 Information Sharing Protocol ..... 25
4.4 Resolution of Opposing Requirements ..... 26
4.5 Inspection and Enforcement Coordination ..... 27
4.5.1 NRC and USCG Inspectors ..... 27
4.5.2 ABS Periodic Survey and the NRC Inspection Program ..... 27
4.5.3 Enforcement Lead for Dual-Function Findings ..... 27
4.5.4 Event Reportability ..... 28

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



5. REGULATORY GAP REGISTER ..... 31
5.1 Gap Register ..... 31
5.2 Open Items Affecting Jurisdiction ..... 35
5.2.1 Agency Decisions (Category A) ..... 35
5.2.2 Bluecore Open Decisions (Category B) ..... 36
6. SSC CLASSIFICATION AND JURISDICTIONAL ALIGNMENT ..... 37
6.1 Classification Approach ..... 37
6.2 Representative SSC Jurisdictional Summary ..... 37
7. NEXT STEPS AND REQUESTED ACTIONS ..... 43
7.1 Questions for NRC ..... 43
7.2 Requests for USCG ..... 45
7.3 Joint Meeting ..... 46
7.4 Topics Deferred to Separate Submittals ..... 46
8. ACRONYMS, ABBREVIATIONS, AND DEFINED TERMS ..... 48
9. References ..... 54

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## NON-PROPRIETARY VERSION

Proprietary information has been redacted per 10 CFR 2.390(a)(4). See Affidavit BLU-CORR-000008. Redacted text is marked with [[ ]] brackets followed by one or more category letters identifying the basis for withholding:
(a) Reactor design parameters, engineering methodologies, safety system configurations, containment design, and related technical information
(b) Planned submittal scope, sequencing, and targeted dates for regulatory engagement
(c) Vendor and supplier relationships, procurement strategy, and partnership terms
(d) Competitive advantage information, novel regulatory positions, first-mover licensing strategies
White text within the brackets preserves the original page layout. The redacted text has been replaced with dummy characters and cannot be recovered.

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



# List of Tables

Table 4-1. Principal NRC and USCG Event Reporting Requirements
Table 5-1. Regulatory Gap Register
Table 6-1. Representative SSC Jurisdictional Summary

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



# 1. INTRODUCTION AND PURPOSE

## 1.1 Purpose and Distribution

This white paper presents Bluecore Energy's proposed framework for coordinating regulatory oversight of the Nautilus Floating Nuclear Power Plant (FNPP) by the U.S. Nuclear Regulatory Commission (NRC) and the U.S. Coast Guard (USCG), with the American Bureau of Shipping (ABS) acting as classification society.

This document is submitted as a white paper under Section 4.2 of Bluecore's Regulatory Engagement Plan (BLU-PLAN-000001). Distribution is as follows: NRC, as docketed pre-application correspondence; USCG, via the Maritime Nuclear Policy Division listing the specific determinations requested in Section 7; and ABS, for information.

The paper addresses three objectives. First, it establishes a function-based criterion for assigning the lead agency for regulatory oversight of each structure, system, and component (SSC) aboard the Nautilus. Second, it applies that criterion to the dual-function systems where NRC and USCG/ABS requirements overlap and identifies the jurisdictional questions that arise. Third, it proposes a coordination protocol for managing the overlap during design, licensing, construction, and operation.

Bluecore requests responses from NRC and USCG. The specific questions this paper asks each agency to address are consolidated in Section 7. Each question is framed as whether staff sees any obstacle to the proposed approach, so that staff can respond without binding itself on conceptual design details.

This paper uses the following conventions so that each request is easy to find. Statements of Bluecore's proposed approach are identified as Bluecore proposals and are kept distinct from established requirements, which are cited directly. Each request for agency feedback appears in a labeled **Agency Feedback Requested** callout immediately after the supporting discussion, with a question number (NRC-# or USCG-#) that matches the consolidated list in Section 7. Each regulatory gap is identified at the point of discussion by its number (G-#) in the Section 5.1 gap register. Because the paper is written for both NRC and USCG reviewers, maritime and nuclear terms that may be unfamiliar to one agency are defined at first use and in Section 8.

The paper is organized as follows. Section 2 states the jurisdictional boundary criterion and applies it to the three SSC categories. Section 3 examines each dual-function system and identifies the jurisdictional interfaces. Section 4 proposes a coordination protocol. Section 5 presents a gap register of topics requiring further regulatory development. Section 6 provides a representative SSC jurisdictional summary. Section 7 consolidates the requested actions and lists topics deferred to

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



separate submittals. Section 7.4 lists related technical questions that Bluecore will address in separate submittals and for which no agency response is requested in this paper. Section 8 lists acronyms and defined terms.

## 1.2 Background

The Bluecore-15 (BC-15) is **[[**

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The Nautilus is expected to be **[[**

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**]]a**. The USCG status determination for the Nautilus has not been decided. A barge permanently moored and not engaged in transportation may be classified as a vessel, as a waterfront facility, or, under the USCG Craft Routinely Operated Dockside (CROD) policy (CG-CVC Policy Letter 09-02), as a permanently moored craft. The applicable inspection regime, Certificate of Inspection requirements, manning, and security framework (33 CFR Part 104 for vessels or 33 CFR Part 105 for facilities) depend on the status determination.

The classifications and regulatory assignments presented in this paper are preliminary and will be refined as the design matures. **[[**

**]]c.**

## 1.3 Regulatory Basis

The USCG-NRC MOU (ML26096A081), signed June 23, 2026, establishes a high-level framework for coordination on civilian maritime nuclear facilities and vessels. It provides for project-specific Memoranda of Agreement (MOAs) and Procedural Documents to allocate oversight responsibilities for individual projects. No project-specific MOA or Procedural Document exists for the Nautilus program as of the date of this paper. Bluecore offers this paper and the proposed Interface Document (Section 4.1) as input for the agencies' consideration in developing any such agreement.

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



# 2. JURISDICTIONAL BOUNDARY CRITERION

## 2.1 Proposed Criterion

Bluecore proposes a function-based criterion for assigning the lead agency for regulatory oversight of each SSC function aboard the Nautilus. The criterion asks one question of each SSC function: is the function credited in the nuclear safety basis?

Where an SSC's function is credited in the nuclear safety basis (through the safety analysis, which includes deterministic design-basis analyses, or through probabilistic risk assessment (PRA) success criteria), NRC is the lead agency for that function. Where an SSC's function serves only maritime design, operational, or regulatory purposes and is not credited in the nuclear safety basis, USCG/ABS lead oversight of that function. Where an SSC performs both a nuclear safety function and a maritime function, the SSC is dual-function: NRC leads oversight of the nuclear function, USCG/ABS lead oversight of the maritime function, and both sets of requirements apply.

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This criterion is deliberately simple. Its purpose is to provide a predictable, repeatable basis for jurisdictional assignment that can be applied as the design matures and the SSC classification is refined. It does not predetermine the outcome of SSC classification.

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The criterion is applied to functions, not to physical equipment. A single valve or damper may perform a nuclear safety function in one mode and a maritime function in another. Both agencies' requirements apply to that component, each with respect to its own function.

## 2.2 Application to SSC Categories

Under this criterion, the SSCs of the Nautilus FNPP fall into three categories.

### 2.2.1 Nuclear-Only SSCs

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### 2.2.2 Maritime-Only SSCs

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### 2.2.3 Dual-Function SSCs

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## 2.3 Accountability Principle

The proposed criterion assigns regulatory oversight of each function to one lead agency but does not preclude the other agency from imposing requirements related to its own statutory authority. For

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dual-function SSCs, Bluecore will develop a unique tag for each SSC that identifies its nuclear function, its maritime function, the NRC regulatory basis, the USCG/ABS regulatory basis, and the lead for each function. These tags will be maintained in the Interface Document described in Section 4.1.

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# 3. DUAL-FUNCTION SYSTEMS

This section examines each system aboard the Nautilus that performs both nuclear safety and maritime functions. For each system, the discussion identifies the nuclear function, the maritime function, the jurisdictional interface, and, where applicable, an Agency Feedback Requested callout and the related regulatory gap. Questions are consolidated in Section 7 and gaps in Section 5.1.

Each subsection is limited to the jurisdictional consequence of the dual function. Detailed licensing-basis analysis belongs in the applicable topical reports and is not addressed here except as needed to frame the jurisdictional question.

## 3.1 Mooring System

The mooring system maintains the Nautilus at its designated station and [[

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## 3.2 Hull Structure

The barge hull provides the platform, buoyancy, and watertight envelope for all plant systems. [[

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## 3.3 Containment-Hull Interface

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## 3.4 Vessel Stability Systems

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## 3.5 Security Perimeter

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## 3.6 Fire Protection

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## 3.7 Shore Power Connection

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## 3.8 Seawater Cooling and Ultimate Heat Sink

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Bluecore is committed to protecting the marine environment around the Nautilus. Intake and discharge arrangements will be designed to limit impingement and entrainment of marine organisms and to keep the thermal plume as small as practical. Site selection and heat rejection design will consider local habitats and species. This approach supports the environmental review under NEPA and CWA requirements, including Sections 316(a) and 316(b).

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## 3.9 Heating, Ventilation, and Air Conditioning

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## 3.10 Electrical Power Distribution

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## 3.11 Bilge, Ballast, and Flooding Protection

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## 3.12 Personnel Access and Emergency Egress

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## 3.13 Crane and Refueling Systems

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## 3.14 Fuel Oil Storage and Supply

Under RG 1.137, ANSI/ANS-59.51, and SRP 9.5.4, EDG fuel oil storage tanks, transfer pumps, piping, and day tanks are Seismic Category I, and typically ASME Section III Class 3 (RG 1.26 Quality Group C).

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# 4. COORDINATION PROTOCOL

This section proposes a coordination protocol for NRC and USCG consideration in developing any project-specific MOA or Procedural Document for the Nautilus. The protocol is offered as input; the form and content of any interagency agreement is the agencies' decision.

## 4.1 Interface Document

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## 4.2 Joint Review Meetings

The joint NRC-USCG pre-application meeting process is described in Bluecore's Regulatory Engagement Plan (BLU-PLAN-000001, Section 2). Bluecore proposes that the initial joint meeting be held after both agencies have received this paper and USCG has received the separate written request described in Section 1.1. The purpose of the meeting is to identify areas of agreement and disagreement and any policy questions requiring further development.

## 4.3 Information Sharing Protocol

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## 4.4 Resolution of Opposing Requirements

Where NRC and USCG/ABS requirements differ only in degree (barrier rating, inspection frequency, QA rigor), both sets of requirements apply. As design progresses, dual-function systems may present requirements that are in tension, for example where contamination control under 10 CFR Part 20 and maritime abandon-ship timing impose conflicting demands on egress procedures (Section 3.12).

Where such tensions arise, Bluecore proposes to evaluate the available resolution options case by case rather than in a fixed order. Options include design modifications, regulatory alternatives such as 10 CFR 73.55(r) alternative measures or 33 CFR 101.130 equivalent security measures, exemptions, and other relief mechanisms available under each agency's regulations. The choice will consider the specific conflict, its safety significance, technical feasibility, and the regulatory requirements involved. The PRA and the damage stability and flooding analyses will inform these evaluations, but they do not by themselves resolve a regulatory conflict; each agency decides on relief from its own requirements. The agreed basis for each resolution will be recorded in the Interface Document, and unresolved items will be tracked as design holds rather than resolved by a default rule. This process is modeled on the safety/security interface requirements of 10 CFR 73.58.

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## 4.5 Inspection and Enforcement Coordination

### 4.5.1 NRC and USCG Inspectors

If requested by NRC, Bluecore will make office space available for NRC inspectors at the shore operations facility and will provide transport to the barge for NRC inspections, including unannounced inspections, subject only to weather and safety limits. Bluecore will identify the dual-function items where both NRC and USCG/ABS inspection programs inspect the same equipment.

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### 4.5.2 ABS Periodic Survey and the NRC Inspection Program

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### 4.5.3 Enforcement Lead for Dual-Function Findings

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### 4.5.4 Event Reportability

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**Table 4-1. Principal NRC and USCG Event Reporting Requirements**

| Event Type | Agency and Requirement | Notification and Written Report |
|---|---|---|
| Emergency classification declared | NRC: 10 CFR 50.72(a) | Immediately after notifying state and local agencies, and not later than 1 hour |
| Non-emergency events, such as Technical Specification required shutdowns, safety system actuations, and degraded conditions | NRC: 10 CFR 50.72(b) | 1-, 4-, or 8-hour notification, depending on the event |

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| Licensee event report | NRC: 10 CFR 50.73 | Written report within 60 days of discovery |
| Physical security events | NRC: 10 CFR 73.1200 and 73.1205 | 15-minute, 1-, 4-, or 8-hour notification, depending on the event; written follow-up report as required |
| Cyber security events | NRC: 10 CFR 73.77 | 1-, 4-, or 8-hour notification, depending on the event; written report as required |
| Defects and noncompliance | NRC: 10 CFR Part 21; 10 CFR 50.55(e) during construction | Initial notification within 2 days; written notification within 30 days |
| Marine casualty (for example, collision, allision, grounding, loss of mooring, fire, flooding, or serious injury) | USCG: 46 CFR 4.05-1 | Immediate notice to the nearest USCG Sector office |
| Marine casualty written report | USCG: 46 CFR 4.05-10 (Form CG-2692) | Within 5 days |
| Suspicious activity, breach of security, or transportation security incident | USCG: 33 CFR 101.305 | Without delay to the National Response Center |
| Discharge of oil or a hazardous substance | USCG: 33 CFR 153.203 | Immediately to the National Response Center |

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# 5. REGULATORY GAP REGISTER

This section identifies topics where existing NRC and USCG regulatory frameworks do not fully address the Nautilus configuration. Topics that will be addressed in separate white papers are listed in the gap register with a pointer to the planned resolution vehicle. Substantive treatment is provided only for gaps that are jurisdictional in nature and require interagency coordination to resolve.

Each gap is numbered (G-1 through G-23) and is cited by number at the point of discussion in Sections 2 through 4. Where agency feedback is requested, the Resolution Vehicle column identifies the corresponding Section 7 question. Table 5-1 presents the complete gap register. Gaps G-13 through G-23 were added in this revision to capture jurisdictional issues identified in the body of the paper.

## 5.1 Gap Register

**Table 5-1. Regulatory Gap Register**

| Gap | Agencies | Resolution Vehicle |
|---|---|---|
| G-1. Siting criteria: applicability of 10 CFR Part 100 Subpart B to an offshore floating facility, including exclusion area, LPZ, and population center distance | NRC; USCG (marine traffic control in exclusion area under 33 CFR Part 165) | [[ ]]bd |
| G-2. Emergency planning for an offshore location: EPZ methodology, USCG as offsite response organization, FEMA offsite plan review under 44 CFR Part 350 for a federal agency in that role | NRC; USCG; FEMA | [[ ]]bd |
| G-3. Marine environmental qualification: qualifying safety-related SSCs for combined marine and nuclear environments; whether ABS type approval test | NRC; ABS | [[ ]]bd |

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| data may be credited through commercial-grade dedication or source verification | | |
| G-4. Cybersecurity boundary: digital assets supporting safety, security, or EP functions are CDAs under 10 CFR 73.54 regardless of maritime role; 33 CFR Part 101 Subpart F applicability depends on vessel/facility status; remote operation command flow into the plant is first-of-a-kind under 73.54 | NRC; USCG | **[[**<br><br>**]]bd** |
| G-5. Vessel or facility status: single USCG determination across 46 CFR and 33 CFR affecting COI, documentation, load line, inspection subchapter, and MTSA applicability | USCG | **[[**<br>**]]bd** |
| G-6. Domestic legal status of 3-12 NM location: several statutes retain a 3 NM territorial sea; potential OCS authorities (OCSLA, BOEM), state lands, CZMA consistency review; NRC-Marine Minerals Administration MOU | NRC; USCG; BOEM; State | **[[**<br><br>**]]bd** |
| G-7. Remote or split control: licensing basis for unattended or remote operation under 10 CFR 50.54(k) and (m), GDC 19, and 10 CFR 73.55(k) | NRC | **[[**<br>**]]bd** |
| G-8. Transit of a fueled facility: decay heat removal, security, USCG towing and navigation requirements, transit through state waters | NRC; USCG; States | **[[**<br><br>**]]bd** |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



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| G-9. Shore refueling and decommissioning facility: licensing basis under Parts 50, 70, and 72 | NRC | **[[ ]]bd** |
| G-10. Waterborne design basis threat: whether waterborne DBT attributes apply as-is to a fully waterborne-accessible facility | NRC (SGI channel) | **[[ ]]bd** |
| G-11. Decommissioning: vessel documentation, class, and inspection status during decommissioning; custody of hull after license termination. Precedent: MH-1A Sturgis (barge-mounted, decommissioned at shore shipyard); NS Savannah (NRC-licensed vessel); Navy ship recycling program | NRC; USCG | **[[ ]]bd** |
| G-12. Transport-to-facility boundary: point at which a package transferred between service vessel and barge passes from Part 71/49 CFR Part 176 transport to Part 50 facility handling | NRC; USCG | **[[ ]]bd** |
| G-13. Dual-function SSC treatment: how SSCs performing both nuclear safety and maritime functions are evaluated, and how conflicting requirements on shared equipment are resolved; the NRC-USCG MOU does not prescribe a method | NRC; USCG | **[[ ]]bd** |

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| G-14. Hull classification: reconciliation of the hull's global support and buoyancy functions with its preliminary NSRST classification and special treatment | NRC; ABS | **[[ ]]bd** |
| G-15. Fuel storage and handling: oversight of fresh fuel at the shore refueling pier, pier-to-barge transfer, and onboard irradiated fuel storage (spent fuel pool or alternative) | NRC; USCG | **[[ ]]bd** |
| G-16. Security and access authorization: allocation of physical security, cybersecurity, and access authorization for the barge, shore control facility, and refueling pier, including NRC inspector access to the barge | NRC; USCG | **[[ ]]bd** |
| G-17. Fire protection: oversight of fires originating in non-safety-related and maritime areas that could affect safe shutdown; alternative to an onsite fire brigade for an offshore facility | NRC; USCG; ABS | **[[ ]]bd** |
| G-18. Offsite power: design basis that does not credit offsite power where a single subsea cable is the only offsite source (GDC 17) | NRC | **[[ ]]bd** |
| G-19. Diverse communications: architecture, independence, and reliability of communications supporting remote operation; no identified NRC-approved precedent | NRC; USCG | **[[ ]]bd** |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



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|---|---|---|
| G-20. Shared emergency electrical systems: shared Class 1E and maritime emergency power sources, load priority, and independence | NRC; USCG; ABS | **[[ ]]bd** |
| G-21. External flooding: applicability of RG 1.59 and RG 1.102 to a floating plant; use of maritime stability and flooding analyses | NRC | **[[ ]]bd** |
| G-22. Corrective action and enforcement: screening of maritime findings in the CAP; enforcement lead for dual-function findings | NRC; USCG | **[[ ]]bd** |
| G-23. Event reporting and information sharing: dual reportability, notification deadlines, investigation coordination, and protection of SGI and SSI | NRC; USCG | **[[ ]]bd** |

## 5.2 Open Items Affecting Jurisdiction

The following items are organized in two categories. Category A lists decisions requested of the agencies; each is owned by the responsible agency and mapped to a Section 7 question and, where applicable, a gap number. Category B lists Bluecore open design decisions that affect jurisdictional assignments; each is owned by Bluecore and will be resolved through the design process and the submittal identified.

### 5.2.1 Agency Decisions (Category A)

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### 5.2.2 Bluecore Open Decisions (Category B)

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# 6. SSC CLASSIFICATION AND JURISDICTIONAL ALIGNMENT

## 6.1 Classification Approach

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**]]abd**. The function-based jurisdictional criterion of Section 2.1 depends on what is credited in the nuclear safety basis, which the classification methodology determines. The framework proposed in this paper is consistent with that methodology. Because RG 1.233 is scoped to non-LWRs, BLU-WP-000003 provides the justification for applying NEI 18-04 to a Part 50 PWR.

The jurisdictional assignments in this paper are preliminary and illustrative. They will be confirmed in the Interface Document as the design and classification mature.

## 6.2 Representative SSC Jurisdictional Summary

Table 6-1 maps each SSC to its nuclear function and governing NRC requirements and its maritime function and governing USCG/ABS requirements. SSC classifications follow BLU-WP-000003, Table 7-1; this table does not repeat the classification basis. The table is illustrative and will be superseded by the Interface Document.

**Table 6-1. Representative SSC Jurisdictional Summary**

| SSC | Nuclear Function / NRC Requirements | Maritime Function / USCG-ABS Requirements | Section Ref. |
|---|---|---|---|
| Reactor pressure vessel | RCS pressure boundary; ASME III NB; 10 CFR | None | 2.2.1 |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



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|---|---|---|---|
| | 50.55a(c); GDC 14, 30, 31, 32 | | |
| Steam generators, pressurizer, RCS piping | RCS pressure boundary and heat transfer; ASME III NB; GDC 14, 15, 30, 31, 32 | None | 2.2.1 |
| Reactor protection system and safety I&C | Reactor trip and ESF actuation; 10 CFR 50.55a(h); IEEE 603; GDC 20-25 | None | 2.2.1 |
| Nuclear instrumentation | Neutron flux monitoring; GDC 13, 20-25; IEEE 603 | None | 2.2.1 |
| Reactivity control systems | Reactor shutdown; GDC 26-29; 10 CFR 50.62 | None | 2.2.1 |
| ECCS | Emergency core cooling; GDC 35; 10 CFR 50.46 | None | 2.2.1 |
| Containment vessel and systems | Fission product barrier; ASME III NE; GDC 16, 50, 51, 52, 53; 10 CFR 50 App J | None | 2.2.1 |
| Containment isolation | Leakage control; GDC 54-57; 10 CFR 50 App J | None | 2.2.1 |
| CVCS | Reactor coolant chemistry and inventory; GDC 14, 29, 33; 10 CFR 50.55a | None | 2.2.1 |
| RHR / decay heat removal | Decay heat removal; GDC 34; SRP 5.4.7 | None | 2.2.1 |
| Radiation monitoring | Dose assessment and effluent control; GDC | None | 2.2.1 |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



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| | 60, 64; 10 CFR 20; RG 1.97 | | |
| Radioactive waste processing | Effluent treatment; GDC 60, 61; 10 CFR 20; 10 CFR 50 App I | None | 2.2.1 |
| Navigation lights, sound signals, AIS, documentation | [[ ]]a | Navigation safety; 33 CFR Parts 66, 80-83, 164.46; 46 CFR Part 67; COLREGS | 3.1 |
| Non-safety fire detection in non-nuclear areas | None | Life safety; 46 CFR applicable subchapter | 2.2.2 |
| Non-credited bilge and ballast | None | Vessel watertight integrity; 46 CFR Subch. S; 46 CFR 56.50-50 | 2.2.2 |
| Maritime fuel oil systems | None | Fuel supply; 46 CFR Parts 56, 58; 33 CFR Parts 155, 156; MARPOL I | 2.2.2 |
| Mooring system | [[ ]]a | Station-keeping; ABS offshore mooring standards; USCG inspection | 3.1 |
| Hull structure (load path and credited watertight boundaries) | [[ ]]a | Structural integrity; ABS Steel Barge Rules; 46 CFR; load line | 3.2 |
| Containment-hull interface | [[ | Hull void-space survey; ABS classification | 3.3 |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



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|---|---|---|---|
| | ]]a | | |
| Vessel stability systems | [[<br><br>]]a | Intact and damage stability; 46 CFR | 3.4 |
| Security perimeter | [[<br><br>]]a | Security zone 33 CFR Part 165; MTSA (part pending); vessel security plan | 3.5 |
| Fire protection | [[<br><br>]]a | Vessel and life-safety fire protection; 46 CFR applicable subchapter | 3.6 |
| Shore power connection | [[<br><br>]]a | Subsea cable as marine installation; FERC/NERC NUC-001; USACE | 3.7 |
| Seawater cooling / UHS (safety-related path) | [[<br><br>]]a | Watertight closure; hull strength; pollution prevention | 3.8 |
| Non-safety condenser cooling | None (addressed in PRA) | Seawater system; USCG/ABS | 3.8 |
| Nuclear HVAC | GDC 19 (control location dependent); GDC 60; RG 1.52 | Maritime ventilation; 46 CFR; ABS Rules | 3.9 |
| Class 1E electrical distribution | GDC 17; IEEE 308; 10 CFR 50.63 (SBO) | EDG/battery rooms as marine spaces; 46 CFR 111.15; EPA emissions; MARPOL VI | 3.10 |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



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|---|---|---|---|
| Maritime emergency generator (if dedicated) | None | 46 CFR Part 112 | 3.10 |
| Credited bilge, ballast, and flood detection | [[ ]]a | Damage stability; 46 CFR bilge and ballast | 3.11 |
| Credited watertight boundaries | [[ ]]a | Damage stability; 46 CFR watertight integrity | 3.11 |
| Personnel access and emergency egress | [[ ]]a | Lifesaving; means of escape; abandon-ship; 46 CFR | 3.12 |
| Crane / heavy load handling | [[ ]]a | ABS certification; API 2C; USCG lifting appliance | 3.13 |
| EDG fuel oil storage (safety-related) | [[ ]]a | Pollution prevention; 33 CFR 155-156; MARPOL I | 3.14 |
| Main step-up transformer and offshore switchgear | [[ ]]a | Marine electrical installation; ABS | 3.7 |
| Shore communications link / remote monitoring | [[ ]]a | GMDSS (if applicable); maritime comms | 3.7 |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



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| Interconnection loss detection and trip logic (barge-side) | **[[ ]]a** | None | 3.7 |
| Inclination / stability monitoring instrumentation | **[[ ]]a** | Stability computer; ABS instrumentation | 3.4 |
| Digital assets (CDAs) | 10 CFR 73.54; RG 5.71 | 33 CFR Part 101 Subpart F (final rule effective 2025; Nautilus MTSA status pending) | 5.1 |
| Liquid effluent / overboard discharge | GDC 60; 10 CFR 50 App I | MARPOL Annex I; 33 CFR 151; CWA | 3.11 |
| Hull and mooring cathodic protection | **[[ ]]a** | ABS classification; hull protection | 3.3 |
| Evacuation route analysis | **[[ ]]a** | Means of escape; abandon-ship | 3.12 |

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# 7. NEXT STEPS AND REQUESTED ACTIONS

This section consolidates every request for agency action in this paper. Each question is numbered (NRC-# or USCG-#) and identifies the section containing the supporting discussion. Where the discussion includes a specific proposed approach, an Agency Feedback Requested callout appears in the supporting section. Where possible, each question is framed as whether staff sees any obstacle to the proposed approach.

## 7.1 Questions for NRC

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## 7.2 Requests for USCG

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Site-specific items (security zone radius, COTP zone) are deferred to the cognizant Captain of the Port (COTP) once a site is selected.

## 7.3 Joint Meeting

Bluecore requests a joint NRC-USCG pre-application meeting to be held after both agencies have received this paper and USCG has received the separate written request. The proposed purpose of the meeting is to identify areas of agreement and disagreement on the framework proposed in this paper and any policy questions requiring further development.

## 7.4 Topics Deferred to Separate Submittals

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# 8. ACRONYMS, ABBREVIATIONS, AND DEFINED TERMS

| Acronym | Definition |
|---|---|
| ABS | American Bureau of Shipping |
| AC | Alternating Current |
| AIP | Atomic Industrial Forum |
| AIS | Automatic Identification System |
| API | American Petroleum Institute |
| ASME | American Society of Mechanical Engineers |
| BC-15 | Bluecore Design Criterion 15 |
| BOEM | Bureau of Ocean Energy Management |
| CAP | Corrective Action Program |
| CEO | Chief Executive Officer |
| CFR | Code of Federal Regulations |
| COI | Certificate of Inspection |
| COLREGS | International Regulations for Preventing Collisions at Sea |
| COTP | Captain of the Port |
| CROD | Control Rod |
| CVCS | Chemical and Volume Control System |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



| | |
|---|---|
| CWA | Clean Water Act |
| CZMA | Coastal Zone Management Act |
| DBT | Design Basis Threat |
| DHS | Department of Homeland Security |
| ECCS | Emergency Core Cooling System |
| EDG | Emergency Diesel Generator |
| EP | Emergency Preparedness |
| EPA | Environmental Protection Agency |
| EPZ | Emergency Planning Zone |
| ESF | Engineered Safety Feature |
| FEMA | Federal Emergency Management Agency |
| FERC | Federal Energy Regulatory Commission |
| FNPP | Floating Nuclear Power Plant |
| FSAR | Final Safety Analysis Report |
| GDC | General Design Criteria |
| GMDSS | Global Maritime Distress and Safety System |
| HVAC | Heating, Ventilation, and Air Conditioning |
| I&C | Instrumentation and Control |
| IEEE | Institute of Electrical and Electronics Engineers |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



| | |
|---|---|
| ISI | Inservice Inspection |
| IWE | Inservice Inspection of Class MC and Metallic Liners |
| LCO | Limiting Condition for Operation |
| LER | Licensee Event Report |
| LEU | Low-Enriched Uranium |
| LMP | Licensing Modernization Project |
| LOOP | Loss of Offsite Power |
| LPZ | Low Population Zone |
| MARPOL | International Convention for the Prevention of Pollution from Ships |
| MOA | Memorandum of Agreement |
| MOU | Memorandum of Understanding |
| MTSA | Maritime Transportation Security Act |
| MWe | Megawatt Electric |
| MWt | Megawatt Thermal |
| NEI | Nuclear Energy Institute |
| NEPA | National Environmental Policy Act |
| NERC | North American Electric Reliability Corporation |
| NFPA | National Fire Protection Association |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



| | |
|---|---|
| NM | Nautical Mile |
| NRC | Nuclear Regulatory Commission |
| NSRST | Nuclear Safety-Related Safety Topic |
| NSSS | Nuclear Steam Supply System |
| NST | Nuclear Safety Topic |
| NTSB | National Transportation Safety Board |
| OCS | Outer Continental Shelf |
| OCSLA | Outer Continental Shelf Lands Act |
| PRA | Probabilistic Risk Assessment |
| PWR | Pressurized Water Reactor |
| QA | Quality Assurance |
| QAPD | Quality Assurance Program Description |
| RCA | Radiologically Controlled Area |
| RCS | Reactor Coolant System |
| RG | Regulatory Guide |
| RHR | Residual Heat Removal |
| RIL | Regulatory Information Letter |
| RPS | Reactor Protection System |
| SBO | Station Blackout |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



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|---|---|
| SGI | Safeguards Information |
| SRP | Standard Review Plan |
| SSC | Structures, Systems, and Components |
| SSI | Safety-Significant Interface |
| TWIC | Transportation Worker Identification Credential |
| UFSAR | Updated Final Safety Analysis Report |
| UHS | Ultimate Heat Sink |
| USACE | United States Army Corps of Engineers |
| USCG | United States Coast Guard |

**Defined Terms.** The following maritime and nuclear terms are used in this paper and may be unfamiliar to reviewers from one of the two agencies.

| Term | Definition |
|---|---|
| Allision | A vessel striking a fixed or stationary object, such as a moored barge or pier, as distinct from a collision between two vessels. |
| Ballast | Water deliberately taken into or discharged from tanks to control a vessel's draft, trim, heel, and stability. |
| Bilge | The lowest internal part of a hull, where leakage and drainage water collect. |
| Cofferdam | An empty, watertight void compartment that separates two adjacent spaces, preventing leakage from one to the other and allowing inspection access. |
| Damage stability | A vessel's ability to remain afloat and upright, within defined limits, after specified flooding of one or more compartments. |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



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|---|---|
| Design basis threat | The adversary characteristics, defined by NRC in 10 CFR 73.1, against which a licensee's physical protection system must defend. |
| Green water | Solid seawater shipped onto a vessel's deck by waves, as distinct from spray. |
| Inclining experiment | A test in which known weights are moved across the deck and the resulting heel is measured to determine the vessel's center of gravity and stability characteristics. |
| Keel cooler | A heat exchanger mounted outside the hull below the waterline that rejects heat to the surrounding seawater without drawing seawater into the vessel. |
| Load line | The marking on a vessel's hull that shows the maximum depth to which it may be loaded, preserving a minimum freeboard. |
| Safe shutdown | A plant condition in which the reactor is subcritical and decay heat is being removed so that fuel and reactor coolant system limits are not exceeded. |
| Sea chest | A recess in the hull below the waterline, fitted with a grating, from which seawater systems draw water. |
| Special treatment | Requirements beyond normal industrial practice, such as quality assurance, qualification, and inspection requirements, applied to an SSC because of its safety significance. |
| Station blackout | Loss of all offsite and onsite alternating current power to the essential and nonessential switchgear buses (10 CFR 50.2). |
| Stationkeeping | A vessel's ability to remain within a defined position envelope, provided for the Nautilus by the mooring system. |

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



# 9. References

**Bluecore Energy Documents**

BLU-PLAN-000001, Regulatory Engagement Plan, Revision 0, September 24, 2026.

BLU-QAPD-000001, Quality Assurance Program Description.

BLU-WP-000003, LMP Methodology and SSC Classification Approach, Revision 0.

**U.S. Nuclear Regulatory Commission Documents**

ML24088A059, Kemmerer Unit 1 Construction Permit Application (fire protection portions).

ML26085A731, RIL 2026-01, Remote Operations for Advanced Reactors.

ML26096A081, Memorandum of Understanding Between the U.S. Nuclear Regulatory Commission and the U.S. Coast Guard on Civilian Maritime Nuclear Facilities and Vessels, signed June 23, 2026.

NUREG-0612, Control of Heavy Loads at Nuclear Power Plants, Resolution of Generic Technical Activity A-36, July 1980.

Regulatory Guide 1.26, Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants.

Regulatory Guide 1.27, Ultimate Heat Sink for Nuclear Power Plants.

Regulatory Guide 1.29, Seismic Design Classification for Nuclear Power Plants.

Regulatory Guide 1.52, Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Post-Accident Engineered-Safety-Feature Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants.

Regulatory Guide 1.59, Design Basis Floods for Nuclear Power Plants.

Regulatory Guide 1.102, Flood Protection for Nuclear Power Plants.

Regulatory Guide 1.137, Fuel-Oil Systems for Emergency Power Supplies.

Regulatory Guide 1.140, Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Normal Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants.

Regulatory Guide 1.155, Station Blackout.

Regulatory Guide 1.189, Fire Protection for Nuclear Power Plants.

Regulatory Guide 1.233, Guidance for a Technology-Inclusive, Risk-Informed, and Performance-Based Methodology to Inform the Licensing Basis and Content of Applications for Licenses, Certifications, and Approvals for Non-Light-Water Reactors.

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



Regulatory Guide 8.38, Control of Access to High and Very High Radiation Areas of Nuclear Power Plants.

Standard Review Plan (NUREG-0800), including Sections 2.2, 3.4.1, 8.2, 9.1.5, 9.5.1, 12.3 through 12.5, 15.0.1, and Chapter 15.

Vogtle Electric Generating Plant Units 3 and 4, Updated Final Safety Analysis Report, Section 9.5.1, Fire Protection Program.

**Code of Federal Regulations (NRC)**

10 CFR Part 20, Standards for Protection Against Radiation.

10 CFR Part 21, Reporting of Defects and Noncompliance.

10 CFR Part 26, Fitness for Duty Programs.

10 CFR 50.2, Definitions.

10 CFR 50.13, Attacks and Destructive Acts by Enemies of the United States.

10 CFR 50 Appendix A, General Design Criteria for Nuclear Power Plants (GDC 2, 3, 4, 17, 19, 26, 44, 60, 61, 62).

10 CFR 50 Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants.

10 CFR 50 Appendix J, Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors.

10 CFR 50.48, Fire Protection.

10 CFR 50.49, Environmental Qualification of Electric Equipment.

10 CFR 50.55(e), Conditions of Construction Permits, Early Site Permits, Combined Licenses, and Manufacturing Licenses (construction defect reporting).

10 CFR 50.55a(h), Codes and Standards (protection and safety systems).

10 CFR 50.59, Changes, Tests, and Experiments.

10 CFR 50.63, Loss of All Alternating Current Power (station blackout).

10 CFR 50.65(a)(4), Requirements for Monitoring the Effectiveness of Maintenance (maintenance rule).

10 CFR 50.68, Criticality Accident Requirements.

10 CFR 50.72, Immediate Notification Requirements for Operating Nuclear Power Reactors.

10 CFR 50.73, Licensee Event Report System.

10 CFR 50.150, Aircraft Impact Assessment.

10 CFR Part 73, Physical Protection of Plants and Materials.

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



10 CFR 73.5, Specific Exemptions.

10 CFR 73.21, Protection of Safeguards Information: Performance Requirements.

10 CFR 73.54, Protection of Digital Computer and Communication Systems and Networks.

10 CFR 73.55, Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage.

10 CFR 73.56, Personnel Access Authorization Requirements for Nuclear Power Plants.

10 CFR 73.58, Safety/Security Interface Requirements for Nuclear Power Reactors.

10 CFR 73.67, Reporting Requirements for Special Nuclear Material of Low Strategic Significance.

10 CFR 73.77, Cyber Security Event Notifications.

10 CFR 73.1200, Notification Requirements.

**Code of Federal Regulations (USCG and DHS)**

33 CFR Parts 80 through 83, Navigation Rules.

33 CFR Part 86, Inland Navigation Rules: Sound Signals.

33 CFR Part 101, Maritime Security: General.

33 CFR 101.120, Alternative Security Programs.

33 CFR 101.130, Equivalent Security Measures.

33 CFR 101.305, Reporting of Security Incidents.

33 CFR Part 104, Maritime Security: Vessels.

33 CFR Part 105, Maritime Security: Facilities.

33 CFR Part 151, Vessels Carrying Oil, Noxious Liquid Substances, Garbage, Municipal or Commercial Waste, and Ballast Water.

33 CFR Parts 155 and 156, Oil and Hazardous Material Pollution Prevention Regulations.

33 CFR 164.46, Automatic Identification System.

33 CFR Part 165, Regulated Navigation Areas and Limited Access Areas.

46 CFR Part 4, Marine Casualties and Investigations (Subpart 4.05).

46 CFR Parts 56 and 58, Piping Systems and Main and Auxiliary Machinery.

46 CFR Part 67, Documentation of Vessels.

Docusign Envelope ID: A0CF828E-ADFC-83CE-83E5-404708BC7DAC



46 CFR Part 112, Emergency Lighting and Power Systems.

49 CFR Part 1520, Protection of Sensitive Security Information.

**Industry Standards**

American Bureau of Shipping, Rules for Building and Classing Steel Barges, January 2026 edition.

American Bureau of Shipping, Requirements for Nuclear Power Systems for Marine and Offshore Applications, Section 2/3.1.

ANSI/ANS-59.51, Fuel Oil Systems for Safety-Related Emergency Diesel Generators.

ASME Boiler and Pressure Vessel Code, Section III, Division 2, Code for Concrete Containments.

ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWE, Requirements for Class MC and Metallic Liners of Class CC Components of Light-Water Cooled Plants.

ASME NQA-1-2022, Quality Assurance Requirements for Nuclear Facility Applications.

IEEE Std 308, Standard Criteria for Class 1E Power Systems for Nuclear Power Generating Stations.

IEEE Std 323, Standard for Qualifying Equipment for Nuclear Power Generating Stations.

IEEE Std 603, Standard Criteria for Safety Systems for Nuclear Power Generating Stations.

NEI 18-04, Risk-Informed Performance-Based Technology Inclusive Guidance for Non-Light Water Reactor Licensing Basis Development.

NFPA 600, Standard on Facility Fire Brigades.

**International Conventions and Federal Statutes**

Clean Water Act (33 U.S.C. 1251 et seq.), including Sections 316(a), 316(b), and 404.

Coastal Zone Management Act (16 U.S.C. 1451 et seq.).

Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREGS).

International Convention for the Prevention of Pollution from Ships (MARPOL), Annex I, Regulations for the Prevention of Pollution by Oil.

Maritime Transportation Security Act of 2002 (46 U.S.C. 70101 et seq.).

National Environmental Policy Act (42 U.S.C. 4321 et seq.).

Outer Continental Shelf Lands Act (43 U.S.C. 1331 et seq.).

Rivers and Harbors Act of 1899, Section 10 (33 U.S.C. 403).

Submerged Lands Act (43 U.S.C. 1301 et seq.).