

# Proposed Changes to Environmental Impact Assessments for License Renewal

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# Perspective

- **The license renewal process has proven thorough, well-reasoned and effective**
- **1996 GEIS has improved the efficiency of the license renewal process**
- **Focus the GEIS updating on what is needed to enhance efficiency, transparency and practicality**

# Proposed Changes

- **New issues are being added; some existing issues are being combined**
- **Some issues do not include a clearly articulated legal and regulatory basis**
- **A meaningful opportunity to comment requires that an agency fully disclose its basis for the action/proposal.**

# Proposed Rule

- **Recommend reclassification of four issues from Category 2 to Category 1 and removal of two issues**
- **Proposed combining of issues resulted in unintended reclassification of some issues**
- **Opportunity to enhance leveraging on issues that are regulated by state and other federal regulatory agencies**

# Draft Regulatory Guide

- **Assure consistency between the final rule and regulatory guide**
- **Descriptions and discussion in the environmental report for Category 1 issues should be limited to new and significant information only**
- **Guidance should employ a graded approach in regard to the level of detail**

# Implementation Timing

- **Final rule should allow at least 18 months from the date of the publication of the final rule for implementation of new format**
- **NEI will sponsor a workshop on the changes once adopted to enhance consistent and efficient implementation**