



June 15, 2026

U.S. Nuclear Regulatory Commission
11555 Rockville Pike,
Rockville, Maryland 20852

Subject: Public Comment on Part 57 Rulemaking (RIN 3150-AL36; NRC-2025-0379)

Dear NRC Staff,

The Nuclear Innovation Alliance (NIA) is an independent, non-profit, non-partisan “think-and-do” tank whose mission is to help create the conditions for success for new nuclear energy so it can play a major role as an energy security and climate solution. Through policy analysis, research, outreach, and education, NIA is catalyzing the next era of nuclear energy. We focus on regulatory modernization, federal and state policy, and enabling private investment to support new reactor commercialization while meeting national environmental and energy security goals.

NIA appreciates the opportunity to comment on the proposed rule establishing 10 CFR Part 57, “Licensing Requirements for Microreactors and Other Reactors with Comparable Risk Profiles” (Docket NRC-2025-0379), published April 2026. NIA also comments on the concurrently published draft guidance NUREG-2271, “Guidelines for Preparing and Reviewing Applications Under 10 CFR Part 57.” NIA commends the NRC staff for publishing an ambitious draft rule incorporating innovative approaches on a short timeline.

This letter addresses NIA's highest-priority recommendations for the final rule. NIA believes the following items from both the proposed rule and draft guidance language (NUREG-2271) should be addressed before finalizing the rule. NIA focused on addressing NRC questions from the Specific Request for Comments section of the proposed rule package in areas that could benefit the most from NIA expertise; therefore, not every question is addressed. Additionally, NIA provides further comments on entry criteria, use of Part 57 for first of a kind (FOAK) deployment, guidance consistency, and categorical exclusion eligibility.

Issues not associated with the specific questions NRC raised in the rule package are addressed first, followed by answers to NIA’s highest-priority NRC questions.

Issues Not Captured in the NRC Question Framework

NIA has identified several substantive issues that do not map to any of the 29 NRC-specific questions, but that NIA believes merit comment.

1. FOAK Deployment: The Case for Separating Construction Permit (CP) and Operating License (OL) Applications

The Problem

The proposed rule's primary pathway requires a joint application for a CP and associated OLs, with the joint application including — at time of filing — final design information, complete operational programs, and sufficient information for a comprehensive safety review. This front-loading requirement is fundamentally incompatible with the engineering realities of FOAK reactor development.

For a novel design, final design is likely to require a combination of any or all of the following: testing and performance data; regulatory feedback on novel design features; design iteration in response to manufacturing development; and site-specific engineering adaptations. Mandating that construction may not commence until the design is complete is arbitrary and, especially for FOAK, risks the challenges that plagued the first Part 52 combined-license construction projects. Requiring a final design at the time of application stage forces FOAK applicants to either over-commit to design details that will require amendment during construction, or delay the application until construction-ready — defeating the rule's expedited timeline objective for FOAK designs.

NIA's Recommendation

The final rule must include an explicit standalone CP pathway for FOAK applicants. NIA recommends that pathway could be structured as follows:

- A standalone CP application includes site suitability assessment, preliminary safety case, design criteria attribute compliance demonstration, and a site parameter envelope establishing bounding conditions for the future OL application.
- Construction may begin on safety-related structures whose design is finalized, under the general construction license mechanism for qualifying activities.
- The OL application is filed, within a defined period before projected fuel loading, incorporating final design information developed during the CP phase.
- The NRC conducts its comprehensive safety review of the OL application, with the CP record available as background but not requiring additional review of settled issues.

This structure is a recognition that the joint CP/OL model, ideal for Nth of a kind (NOAK) deployments of proven designs, creates a wholly impractical front-loading barrier for FOAK applicants. Importantly, it enables designs otherwise eligible for this pathway to benefit from the reduced regulatory burden of Part 57.

NIA notes this recommendation is not in lieu of the joint CP/OL option: the rule should accommodate both pathways explicitly and the applicant should have the choice of which option to pursue. NIA also notes that there are current developers using analogous pathways under the existing regulatory framework who would not have been permitted under the proposed rule as written.

2. Guidance

- a. Inconsistencies Between Proposed Rule and Draft NUREG-2271 “Guidelines for Preparing and Reviewing Applications Under 10 CFR Part 57”**

The following inconsistencies between Part 57 and NUREG-2271 should be addressed, especially where the guidance attempts to establish new requirements not in the rule.

Nuclear Siting Category (NSC) Thresholds

NSC-1 through NSC-5 dose thresholds and seismic design category (SDC) mappings appear only in NUREG-2271 Appendix F, not in binding rule text. Therefore, it appears that NRC's intention is not to require a strict mapping between NSC and SDC. However, the guidance mapping indicates that the NSC and SDC are locked together as a one-to-one relationship. NSC is a screening tool and should not automatically become the seismic design requirement without allowing an applicant to show how the risk of the facility informs the SDC. For example, risk-informed reactor designs and safety features could justify a lower SDC without a detailed seismic study. Seismic studies to justify the SDC have no regulatory basis for most low-risk facilities. A risk-informed, performance-based pathway should be available for low-consequence reactors. Therefore, NIA recommends that Appendix F be modified to allow alternative approaches to the evaluation of external hazards (such as the approaches described in NUREG-1537), if justified.

Conflict with Part 51

§57.350 categorical exclusion criteria reference Part 51, Appendix C, Table C-1 values that are more stringent than NUREG-2271, Tables E-1/E-2 for some issues, creating a conflict that may force eligible applicants to seek exemptions. NIA recommends that the table values be reconciled.

Quality Assurance

Part 57 explicitly states Appendix B is not imposed; NUREG-2271 §11.5 frames Appendix B as the primary option, with non-Appendix-B approaches requiring gap analysis. This creates a default expectation inconsistent with the rule's intent to treat all approved QA approaches equally. NIA recommends NRC align the guidance language with the rule language of not imposing Appendix B.

Multiple Units

NUREG-2271 introduces an expectation to consider accidents at multiple units, even if the units are independent, a requirement that is historically unprecedented. Similarly, the rule language at §57.25 implies multi-unit events must be considered, irrespective of the extent to which units are interconnected, whereas the precedent in Part 100 does not require consideration of multi-unit events except where units are "interconnected to the extent that an accident in one reactor could affect the safe operation of any other." NIA recommends aligning the Part 57 rule language with this precedent by removing "nuclear plant design" from §57.25, and correcting NUREG-2271 (e.g., Table 12-2) to remove the expectation of multi-unit consideration for independent units.

3. Categorical Exclusion Framework

Proposed §57.350(b) includes criteria that must be met for issuance of an initial or renewed license to be eligible for categorical exclusion. As described in more detail below, while most of these criteria are logical in *considering* eligibility, they should not be used as strictly determinative:

- Proposed §57.350(b)(1) requires demonstration that "the licensed action is within the environmental plant parameter and site parameter envelope for Table C-1 of Appendix C

of 10 CFR part 51.” This requirement is overly prescriptive and is likely to limit many advanced reactor developers. NIA recommends that Table C-1 be used as indicative of eligibility, but not as a hard, deterministic requirement.

- Proposed §57.350(b)(2)(i) requires the site to be within a previously disturbed area. §57.3 defines previously disturbed areas “as areas that have been changed by development of a prior facility and remain altered by human activity such that they do not provide habitat for ecologically important species, such as those protected under the Endangered Species Act [ESA], and no longer have the potential to yield historic and cultural resources.” The definition of “previously disturbed area” conflates “previously disturbed” with “no ESA habitat and no potential for historic/cultural resources,” when those are separate determinations. A heavily disturbed industrial site might still have subsurface historic resource potential, and a pristine greenfield might be entirely devoid of such resources. The definition creates a yes/no eligibility gate rather than a sensitive-resource screen calibrated to actual impacts. This restriction is unnecessarily narrow and not environmentally justified for reactors whose physical footprint is a fraction of large LWRs. NIA recommends an alternative means of screening a site be developed to enable performance-based categorical exclusions.
- Proposed §57.350(b)(2)(ii) bars the use of a categorical exclusion for facilities using surface water or groundwater for cooling, even though the vast majority of previous NRC environmental reviews, including reviews for much larger facilities than anticipated under Part 57, have found cooling system effects to be small or insignificant. As above, a more performance-based screening process should be made available.
- Proposed §57.350(b)(2)(iii) requires air emissions to be below de minimis threshold levels in 40 CFR 93.153(b)(1) or (b)(2), as applicable. As above, these thresholds should not be codified as the yes/no air-emissions eligibility test. Whether the project is located in an attainment area significantly influences the impact of that project on the environment. NRC should address air emissions through a sensitive-resource screen that considers hazardous as well as criteria air pollutants, greenhouse gas emissions, construction emissions, fugitive dust, emergency generator emissions, and major-source permitting issues.
- Proposed §57.350(b)(2)(iv) requires the licensed activity be “in accordance with applicable state and local requirements.” While it is reasonable, within applicable guidance, for the NRC to establish an understanding of the applicant’s plans for non-NRC permits, some of those permits will not be timely relative to the NRC licensing action. Further, it is not within the NRC’s regulatory purview to require compliance with non-NRC permits as a requirement of the NRC license. NIA recommends that this requirement be eliminated.

Finally, the rule should provide a means for applicants with prior NRC approvals (e.g., a Part 50 CP) to pursue categorical exclusions, where appropriate.

NRC Specific Request for Comments Framework

As previously stated, NIA focused on addressing NRC questions in areas that could benefit the most from NIA expertise, so not every question is addressed

Q#	NIA Priority	Question	NIA Comment Position
Q1-1	Priority 1 (NIA)	In lieu of applying a deterministic material limit on the quantity of SNM to ensure safety, should the Commission consider an alternative performance-based entry criterion? Please explain the basis for your recommendation.	NIA is concerned about the use of a deterministic entry criterion that is not risk informed, particularly given that the §57.30 design criteria attributes set additional constraints on reactor designs eligible to use Part 57. The proposed rule states that “design criteria attributes emphasize the features of inherently and passively safe reactors that make them secure and protective against radiological harm.” The design criteria attributes include reactivity control, heat removal, fission product retention, shielding, radioactive effluents control, and security by design. Although the design criteria are not framed as “entry criteria”, they are no less binding on the technology, and the rule notes that if a design does not meet these attributes then they need to apply under a different framework. Given that the design attributes are essentially entry criteria, there is no benefit to establishing this additional entry criterion, which could disadvantage designs otherwise fully compatible with the low-consequence regulatory framework. NIA recommends the design criteria attributes in tandem with the accident dose-based entry criteria be considered the entry gates to the rule.

Q#	NIA Priority	Question	NIA Comment Position
Q3-2	Priority 1 (NIA)	Recognizing that part 57 shares similar features with part 53, are there any provisions in part 57 that should be adapted for part 53 to enhance their complementary nature? For example, should the NRC include provisions in part 53 that would provide a general license for partial reactor construction or allow applicants to reference a general area for siting? If so, what, if any, modifications to the language in part 57 would be needed for it to be appropriate in part 53?	NIA commented extensively during the Part 53 rule development process and appreciates the opportunity to continue to provide insights. There are several areas of Part 57 that could be incorporated into a future modification of Part 53. NIA suggests NRC consider the following topics for updating Part 53 to reflect Part 57 provisions: CatEx, general license (GL) for construction (in lieu of limited work authorization (LWA)), risk-informed security harmonization, alternatives to Appendix B quality assurance programs, and graded PRA for low-consequence reactors. NIA notes that Part 53 modification can proceed on a separate track from Part 57 completion.
Q3-3	Priority 1 (NIA)	Because the proposed part 57 directs licensees to use 10 CFR 50.59, which uses the term “important to safety,” and that term is not used in part 57, should the NRC explain in a guidance document how a part 57 licensee should use 10 CFR 50.59 or should the final part 57 include its own specific 10 CFR 50.59-like process?	The 50.59 process provides a solid, well-understood framework for evaluating changes that can be implemented without NRC approval in advance. Owing to the differences in the licensing basis between Parts 50, 53, and 57, NIA recommends clarification of those aspects of Part 57 that materially impact the 50.59 process. At a minimum, NRC needs to ensure “important to safety” under the 50.59 framework has the same meaning as “safety related” for consistency across regulatory pathways using 50.59. Further, NIA recommends a companion guidance document describing the detailed implementation of the 50.59 process within the Part 57 pathway be developed in consultation with industry and other stakeholders.

Q#	NIA Priority	Question	NIA Comment Position
Q4-1	Priority 1 (NIA)	Should a proposed part 57-compatible early site permit process be developed? Describe the potential value of creating a proposed part 57-compatible ESP process, including the benefits and drawbacks of such an approach for applicants and stakeholders, and whether this process could facilitate more timely and predictable licensing outcomes.	<p>NIA recommends that an early site permit (ESP) process be an option included in Part 57. The lack of a means to resolve siting issues in advance of a joint CP/OL application deprives prospective applicants of a potentially important tool in reducing deployment risk. An ESP can be especially important in addressing site issues early for multi-unit sites or developers intending to use a site but not having yet made a technology decision. Not all users of Part 57 would want or need an ESP process, but it ought to be available as an option. While an ESP necessarily results in an additional step, applicants have found this additional process to be useful in overall project development, reducing risk in a way that makes sense for their individual timelines and business cases. This option also could be important for a site or design where a categorical exclusion is not expected to be available. NRC should make this option available because it is worthwhile at least in some cases.</p> <p>Additionally, while not directly related to the inclusion of an ESP process, NIA recommends a part 57-compatible Limited Work Authorization process be developed. Proposed Part 57 requires a joint CP/OL application, so an avenue for limited safety-related construction would be useful to precede the joint application submittal.</p>

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Q4-2	Priority 1 (NIA)	What types of site issues (e.g., seismic, emergency planning, tribal consultations) would benefit most from early resolution under such a process?	Any of the “standard” issues addressed under a Part 52 ESP would be equally useful under a Part 57 ESP, where an ESP makes sense for a given applicant’s plans. Notably, emergency planning is expected to be simpler, based on the reduced offsite requirements for a design that qualifies for use of Part 57. Environmental issues would be more straightforward under an environmental assessment (EA)/ finding of no significant impact (FONSI), and effectively resolved under a categorical exclusion. But other topics including seismic/geotech, tribal consultations and other cultural resources, and other site-specific issues (e.g., hydrology, meteorology, industrial hazards, etc.) could be meaningfully addressed under an ESP.
Q4-3	Priority 1 (NIA)	Would a part 52-type ESP process reduce licensing uncertainty and costs for developers, and if so, how?	NIA notes that the response to Q4-1 addresses this question.
Q7-1	Priority 1 (NIA)	Provide feedback on the need for alternate dose rates for transportable microreactors, the technical basis for those alternate dose rates, and the safety implications for those alternative dose rates.	NIA believes that the current U.S. nuclear radiation framework generally works well but could certainly be improved. Any changes the U.S. makes in its radiation protection framework should be based on the best available scientific information and done through a transparent process that maintains public trust. Public trust is extremely important in maintaining the momentum of new nuclear energy. NIA does not see the need for alternate dose rates for transportable microreactors. The NRC would need to evaluate various traffic and design basis scenarios to determine whether to increase the dose rate. Additionally, the current transportation limits are aligned with other federal agencies and international standards. NIA recommends maintaining the current limits and including the option for exemptions.

Q#	NIA Priority	Question	NIA Comment Position
Q7-3	Priority 1 (NIA)	Provide feedback on the impact to international and interstate shipments if there were alternate transportation package dose rate limits for transportable microreactors.	The current Part 71 dose limits were developed with coordination from the Department of Transportation. Additionally, these limits are closely aligned internationally with the International Atomic Energy Agency. NIA is concerned that creating an alternative transportation package dose rate could be disruptive for American developers exporting their products. Adopting new dose rates could become an administrative burden for the NRC to implement. NIA recommends NRC carefully evaluate the interest in, the value of, and concerns about alternative dose rate limits. In general, NRC should continue harmonization with international standards to allow developers to be competitive outside of the US without an added administrative burden on the agency.
Q9-1	Priority 1 (NIA)	<p>Consistent with the objectives of this proposed rule to support high-volume licensing of microreactors and other reactors with comparable risk profiles, should the NRC include certain proposed part 57 applications within the definition of “highly expedited proceeding” if the NRC issues a final rule modifying the NRC’s contested hearing process with special requirements for highly expedited proceedings?</p> <p>Specifically, when a proposed part 57 application references an NRC approval providing finality on the design in the adjudicatory proceeding, the scope of issues for adjudication would be narrow, supporting an even more expedited schedule for filings and decisions. Licensee-initiated amendments to proposed part 57 licenses should be similarly narrow. Therefore, should the NRC include these types of proposed part 57 applications within the § 2.4 definition of “highly expedited proceeding” and thereby apply requirements for highly expedited proceedings to these</p>	<p>NIA acknowledges the importance of and strongly endorses the concept of transparency and public participation in the licensing process. That said, when finality is established for a licensing decision, any matter around which that finality is established should not be subject to continued litigation. As such, the hearing opportunity may be appropriately limited to petitions for certification of questions to the Commission pursuant to 10 CFR 2.323(f)(2). When a Part 57 application references design finality AND qualifies for a categorical exclusion, the Presiding Officer should be screening hearing requests to determine if significant and novel legal or policy issues are submitted that warrant a contested hearing.</p> <p>As clarification, however, NIA does not believe that any given licensee-initiated amendment to a license under Part 57 would be automatically eligible for consideration as a highly-expedited proceeding. NRC should perform an</p>

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		<p>applications? If these applications were to be included within the scope of highly expedited proceedings, should the NRC include the following definition of “highly expedited proceeding” in § 2.4 (<i>question proposes markup</i>)</p>	<p>evaluation to determine whether the proposed amendment is bounded by finality of its prior determinations.</p>
<p>Q9-2</p>	<p>Priority 1 (NIA)</p>	<p>What hearing schedule requirements should apply to proposed part 57 joint applications for construction permits and operating licenses that would not be included within the proposed definition of “highly expedited proceeding”? Under the proposed rule to streamline the NRC’s contested hearing process, 10 CFR part 50 or 52 applications for new reactor licenses with no design finality in the adjudicatory proceeding would be subject to the longest hearing schedules because these are considered to be the most complex applications. However, proposed part 57 is limited to smaller reactors with less complex designs and operational characteristics and low potential radiological consequences, which should limit the potential complexity of the license application. Also, proposed part 57 is intended to support more expedited reviews. Therefore, should the NRC treat proposed part 57 applications that are not within the proposed definition of “highly expedited proceeding” in accordance with the proposed hearing schedules that would apply to most types of license applications, such as 10 CFR part 54 license renewals, rather than the longer hearing schedules reserved for the most complex applications? Please provide a basis for your response.</p>	<p>The schedule for the CP should be the mandatory hearing schedule that was recently adjusted by the NRC final rule on conduct of mandatory hearings. If there is a contested hearing, the schedule for a Part 50 proceeding without finality seems appropriate as any contention admitted will likely reflect some level of complexity. Contested hearings on either the CP or the OL should follow a schedule consistent with the nature of the complexity of the contention to provide for transparency and consistency in resolving contested issues.</p>

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Q10-1	Priority 1 (NIA)	<p>Should the NRC allow remote operations and autonomous operations of nuclear power plants that demonstrate low consequences? What, if any, additional requirements and guidance are necessary for the regulatory review of remote operation and autonomous operation as part of the rapid licensing envisioned under part 57?</p> <p>Please provide a basis for your response.</p>	<p>NIA believes the concepts of remote operation and autonomous operation are fundamental to the value proposition for large-scale deployment, particularly of certain microreactors. For those designs with simple operations and well-defined fail-safe states, an applicant may well be able to demonstrate both remote and autonomous operations are viable and safe, including consideration of challenges such as cybersecurity, the potential for signal interruption, etc.</p> <p>Remote operation appears relatively straightforward, provided communications from an offsite control room and the actual plant are available and adequately protected. Autonomous operation (defined as “performance of operational and safety functions without reliance on human intervention, external command, or active control system input under normal, abnormal, and accident conditions”) may be more complex in implementation: in some ways it could be envisioned as a natural extension of remote operation (e.g., how the plant responds if remote operations signals are lost); it could also be considered to apply to existing application of automated systems (e.g., automatic plant response to a transient condition). In the case of a natural extension of remote operation, additional guidance, informed by robust stakeholder engagement, would likely be beneficial. However, existing applications of automated systems are well understood technology. NIA recommends clarifying where additional guidance is needed with technology developers, prospective owner/operators, and Standards Development Organizations (SDOs) as a useful first step.</p>

Q#	NIA Priority	Question	NIA Comment Position
Q11-1	Priority 1 (NIA)	To what extent should the proposed part 57 implementation guidance consider the single failure criterion as a desired attribute to enhance reliability and defense in depth, rather than as a limiting factor in determining whether reasonable assurance of adequate protection exists for advanced reactor designs with enhanced margins of safety and/or that use simplified, inherent, passive, or other innovative means to accomplish their safety and security functions? Please provide a basis for the response.	NIA notes that there are issues comparing single failure criterion (SFC) in passive systems vs. more traditional technology. The relevance of SFC to largely passive systems is obviously less than for historical requirements, for instance, that no <i>single failure of an active safety system component</i> shall prevent the system from performing its safety function. Translating that requirement to a passive scenario, where an analogous phenomenological failure is simply not credible, is incoherent. Accordingly, other means - such as evaluation of uncertainty in modeling, establishment of clearly substantial margins, and consideration of highly conservative, even non-physical events in a maximum hypothetical accident (MHA), for instance - must be allowed to serve an equivalent purpose. Therefore, SFC cannot be considered a limiting factor in any traditional sense. Depending on the details of the safety case, it may be an attribute that contributes to reasonable assurance.
Q11-2	Priority 1 (NIA)	Are there criteria or methods that can be included in the proposed part 57 implementation guidance that provide balance between the use of deterministic methods such as the single failure criterion and applicant-derived risk information to provide for reasonable assurance of adequate protection of public health and safety? Please provide a basis for the response.	Draft NUREG-2271 and additional criteria or methods risk being fundamentally flawed with regard to defense in depth for Part 57-eligible designs. There are ample tools available for demonstrating defense in depth, design margin, and reliability from traditional licensing approaches. Some of these methods might be useful when employing a maximum credible accident (MCA) approach whereby discrete events are described. However, an MHA is <i>not</i> tied to a mechanistic sequence of events or structures, systems, or components (SSC) performance. It is a source term bounding construct, not a

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			<p>physical accident model. Under NUREG-1537, defense in depth in the context of the MHA is demonstrated largely by showing that the bounding source term — even at maximum conservatism — stays within acceptable dose limits.</p> <p>The MHA itself <i>stands in for</i> explicit defense-in-depth credit: if the worst imaginable release is acceptable, then any more realistic sequence with actual safety barriers engaged is even more acceptable. This is why the NUREG-1537 MHA methodology does not require modeling SSC actuation or crediting engineered safety features in the source term transport analysis.</p> <p>Because the MHA conservatively assumes failure of SSC barriers, if the dose is still acceptable, then the design provides <i>inherent</i> margin that more than compensates for any realistic accident progression. In other words, defense in depth is demonstrated by the conservatism of the bounding analysis, not by explicitly showing that multiple independent barriers each function.</p> <p>NIA recommends that NUREG-2271 be updated to reflect this reality.</p>

Q#	NIA Priority	Question	NIA Comment Position
Q12-2	Priority 1 (NIA)	<p>What additional, intermediate, or hybrid alternatives (e.g., targeted modifications to part 52, streamlined ITAAC constructs, or scoped use of part 53 elements) should the NRC evaluate to meet the statutory objectives while minimizing cost and schedule impacts? Please provide data, examples, or suggested regulatory text that could enable rapid, high-volume licensing of microreactors within or alongside existing regulations.</p>	<p>NRC should prioritize the completion of Part 57, including timely stakeholder engagement in updating NUREG-2271 and developing new guidance as discussed in these comments.</p> <p>In parallel, if a developer is prepared to do so, NRC should consider a pilot execution of a Part 50 “NPUF” pilot, using methods very similar to those described in Part 57. If such a pilot can be completed in a timely manner, it could provide valuable insight into early implementation of Part 57.</p> <p>NIA notes that much of the language in the proposed Part 57 rule supports NOAK designs. Thus, NIA expects Part 57 to enable a pathway from existing or future Part 50 permit or license holders to transition to Part 57 if they meet eligibility criteria.</p>

NIA previously provided input on the NRC Actions on Low-Consequence Reactors public workshop held in July 2025 and appreciates the opportunity to comment on the proposed rulemaking. NRC development of a new risk-informed and performance-based regulatory framework for rapid licensing of new microreactors and other reactors with comparable risk profiles will help create more effective, efficient, and predictable licensing processes while still protecting workers, public health and safety, and the environment.

NIA thanks NRC staff, management, and the Commission for their continued efforts to develop a new regulatory framework that will enable high volume licensing. If you have any questions, please contact Miranda McGuire at mmcguire@nuclearinnovationalliance.org.

Sincerely,

Judi Greenwald
President & CEO
Nuclear Innovation Alliance