

November 13, 2020

Chairwoman Kristine Svinicki
U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Commissioner David A. Wright
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Commissioner Jeff Baran
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Commissioner Christopher T. Hanson
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Commissioner Annie Caputo
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Subject: Comments on “Development of NRC's Strategic Plan for Fiscal Years 2022 Through 2026” [Docket ID NRC-2020-0194]

Dear Chairwoman Svinicki and Commissioners Baran, Caputo, Wright and Hanson:

Thank you for the opportunity to provide comments on Federal Register Notice “Development of NRC's Strategic Plan for Fiscal Years 2022 Through 2026” (85 FR 56275).

We believe that solving climate change is one of the most pressing and important challenges facing America and the world, and nuclear power is essential in meeting that challenge. This includes ensuring the continued, safe operation of America’s existing nuclear power plants, and ensuring that the next generation of advanced nuclear technologies can be available to the market in time to meet the growing demand for clean energy that allows America to meet its clean energy goals.

We recognize the important role the Nuclear Regulatory Commission (NRC) plays in ensuring the safety of America’s civil nuclear fleet. Safety can be assured by a combination of smart regulations and technical innovations. Advanced nuclear technologies use a variety of features that can enhance safety. Thus, the new technologies being proposed by America’s innovators will require a new approach to licensing, as the NRC has recognized in its efforts to develop 10 CFR Part 53.

It is also important that these new designs are able to be rapidly deployed in conjunction with state and national climate goals to reduce emissions in the coming decades. Meeting the climate challenge will require us to rapidly decarbonize the power sector and determine the best ways to decarbonize other energy sectors. To do that, we will need advanced nuclear technologies available by the end of this decade.

This means that the years 2022-2026 will be critical in the development and licensing of these decarbonization tools. We do not doubt that the NRC will continue to ensure that any reactor licensed for operation in the United States will be safe. However, a primary objective of the Atomic Energy Act is to enable the safe use of atomic energy to the maximum benefit of the general welfare. This objective is more urgent now than ever before. The NRC must view and understand its safety and security mission as a function of broader U.S. policy on nuclear energy, particularly in light of the serious threat of climate change.

As such, we believe a modern, risk-informed NRC is essential to enabling continued safety and performance and to paving the way for new nuclear. There is a national need for safe, carbon-free nuclear power to play a major role to address climate change and the next five years are likely to be extremely consequential for the United States. Working with industry and other stakeholders, we believe the NRC can ensure that the licensing of advanced reactors happens quickly without compromising safety. Along these lines, we encourage the NRC to proactively modernize regulations to allow new technologies to operate safely and efficiently and provide a cost-competitive option for always available carbon-free power.

The decisions made by the NRC in the next few years will determine whether or not there is a future for advanced nuclear energy in the United States. This will have a direct impact on our ability to meet our carbon reduction goals. Safe nuclear power, overseen by a strong, independent regulator, is a key element of our low carbon future. We encourage the emphasis and focus of the NRC's 2022-2026 Strategic Plan to recognize that both existing and new nuclear technologies play a significant role in addressing climate change, and to ensure a reasonable and effective process for licensing new advanced nuclear technologies so that they can be brought to market as quickly and efficiently as possible.

Addressing climate change was not a consideration when the NRC was established. But as repeated analyses have made clear, addressing climate change is a significant challenge and threat to our nation. We need every agency within the federal government to use its power to expedite the transition to safe, clean sources of energy that will allow us to rapidly decarbonize our economy.

Sincerely,

Third Way
ClearPath
Bipartisan Policy Center

Nuclear Innovation Alliance
Nuclear Matters