

## U.S. Nuclear Regulatory Commission Public Meeting Summary

October 30, 2019

**Title:** Public Meeting to Discuss the Alternatives to the Use of Credit Ratings Rulemaking

**Meeting Identifier:** 20191104

**Date:** October 30, 2019

**Location:** U.S. Nuclear Regulatory Commission  
Two White Flint North, TWFN-6-D-02  
11555 Rockville Pike  
Rockville, MD 20852

**Category:** Category 3

**Purpose of the Meeting:** To provide an opportunity for the NRC and external stakeholders to exchange information on the impact of the Alternatives to Credit Ratings proposed rule.

**General Details:** The meeting was attended by 14 NRC staff and 12 members of the public.

**Summary of NRC Presentation:** The NRC staff presented an analysis of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) and its impact on the NRC regulations. The staff also discussed the alternatives for implementing the requirements of the Dodd-Frank Act, the staff's recommendation for a proposed rulemaking, and the rulemaking timeline for the proposed rule.

**Summary of Public Feedback:** Participants, including representatives from the Nuclear Energy Institute, the law firm Morgan, Lewis & Bockius, Florida Power and Light Company, and Exelon, provided remarks on the industry's views on the proposed rule. The consensus of the views shared by meeting participants is that a proposed rule which relies on existing financial tests would have a substantial financial impact on the industry. In addition, participants recommended the NRC examine what approaches other agencies have taken to implement the Dodd-Frank Act requirements and use this information to help identify new financial tests for providing financial assurance of decommissioning funds that do not expose the industry to excessive financial burden.

### **Action Items/Next Steps:**

The staff will consider, to the extent possible, public feedback received to inform the development of the proposed rule and associated guidance.

### **Additional Information:**

- Meeting notice and agenda: Agencywide Documents Access and Management System (ADAMS) Accession No. ML19276F107
- NRC staff presentation: ADAMS Accession No. ML 19298B445
- Public meeting transcripts: ADAMS Accession Nos. ML19319B676 and ML19319B677

SUMMARY OF CATEGORY 3 PUBLIC MEETING TO DISCUSS THE ALTERNATIVES TO THE USE OF CREDIT RATINGS PROPOSED RULE

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**ADAMS Accession Nos.:**

**Package ML19276F011; Notice ML19276F107; Summary ML19322A692; NRC Presentation ML19298B445;**

**Meeting Transcripts ML19319B676 and ML19319B677**

\*concurrence via e-mail

OFFICE	NMSS/REFS/MRPB/PM	NMSS/REFS/MRPB/RS	NMSS/REFS/FAB/BC	NMSS/REFS/MRPB/BC
NAME	GTrussell	ALoveBlair	FMiller	JCai
DATE	11/18/2019	11/19/2019	11/21/2019	11/19/2019

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**MEETING ATTENDANCE**

**PUBLIC MEETING TO DISCUSS THE ALTERNATIVES TO THE USE OF  
CREDIT RATINGS RULEMAKING**

**U.S. NUCLEAR REGULATORY COMMISSION  
TWO WHITE FLINT NORTH, TWFN-6-D-02  
11555 ROCKVILLE PIKE  
ROCKVILLE, MD 20852**

**OCTOBER 30, 2019, 10:00 AM TO 12:00 PM**

<b>Name</b>	<b>Affiliation</b>
Jana Bergman	Curtis Wright
Angella Love Blair	NMSS
Richard Turtill	NMSS
Caroline Carusone	NMSS
Daniel Mussatti	NMSS
Craig Sly	Dominion Energy
Fred Gerloff	Dominion Energy
Jerry Bonanno	NEI
Mark Richter	NEI
Greg Trussell	NMSS
Mark Lintz	NMSS
Aaron Sanders	NMSS
Brian Harris	OGC
Kosmas Lois	NMSS
Tabalou Emil	NMSS
Fred Miller	NMSS
Nicole Fields	NMSS
June Cai	NMSS
John Matthews	Morgan, Lewis & Bockius
Steve Hamrick	Florida Power
Phil Lashley	First Energy
Jan Bourdart	Nuclear Information Services
Jeff Dunlap	Exelon
Susan Raimo	Entergy Services
Paul Bessette	Morgan, Lewis & Bockius
Rod McCullum	NEI