



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

June 10, 2020

Mr. Doug True  
Sr. Vice President and Chief Nuclear Officer  
Nuclear Energy Institute  
1201 F Street NW, Suite 1100  
Washington, DC 20004

Dear Mr. True,

Thank you for your letter dated March 5, 2020, transmitting NEI's report, "Recommendations for Streamlining Environmental Reviews for Advanced Reactors" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20065N155). The NRC appreciates the input we receive from all of our stakeholders to inform our efforts to continuously improve the efficiency and effectiveness of our review activities, including the implementation of the Agency's responsibilities under National Environmental Policy Act (NEPA) and associated rules, regulations, and policies.

For your awareness, the NRC is currently working on multiple initiatives to enhance and streamline environmental reviews for advanced reactors while ensuring we continue to meet our obligations under NEPA. As we implement these initiatives, we will consider the report's recommendations. Staff has undertaken or begun various activities in anticipation of environmental reviews of advanced reactor applications that recognize the likely smaller environmental impacts that can arise from certain advanced reactor designs, particularly micro-reactors. Recent activities include:

- Evaluation of the requirements in 10 CFR Part 51 to identify areas where flexibilities may be provided to better tailor the environmental review to the impacts associated with advanced reactor designs.
- Publication of draft Interim Staff Guidance Document, ISG-029 "Environmental Considerations Associated With Micro-Reactors" (85 FR 11127, dated February 26, 2020), for comment.
- Completion of an advanced reactor generic environmental impact statement (GEIS) exploratory process (ADAMS Accession No. ML20052D175) and initiation of related scoping activities for the development of the advanced reactor GEIS (85 FR 24040, dated April 30, 2020).
- Completion of two Pacific Northwest National Laboratory reports related to the implementation of 10 CFR 51.51, "Uranium fuel cycle environmental data—Table S-3," and 10 CFR 51.52, "Environmental effects of transportation of fuel and waste—Table S-4," to determine the impacts from the fuel cycle and transportation of fuel and waste for non-light water reactors (ADAMS Accession Nos. ML20084L390 and ML20076G075).

- Consideration of increased use of incorporation by reference and improvements to the clarity and conciseness of staff environmental documents. Draft ISG-029 includes guidance on use of incorporation by reference and recent subsequent license renewal environmental impact statements have expanded the use of incorporation by reference. The staff continues exploring further opportunities to increase use of incorporation by reference, including utilizing information from existing environmental analyses.
- Evaluation of alternatives based on the potentially unique purpose and need for the project. The staff notes an advanced reactor applicant may request licensing for purposes other than electric power production, and alternatives that have been considered for large light water reactor licensing may not be appropriate.
- Consolidation of all environmental review staff under a single Center of Expertise (COE) in the Office of Nuclear Materials Safety and Safeguards. The NRC's environmental review staff now report to the NRC's Chief Environmental Review Permitting Officer and are in a better position to share and implement best practices across the agency.

The environmental staff routinely participate in public meetings, such as the periodic advanced reactor stakeholder meetings, to provide updates on these initiatives. Several of the above initiatives include formal public comment periods and we welcome stakeholder feedback on our environmental products. The NRC is also closely monitoring activities by the Council on Environmental Quality and actively participating in interagency meetings with the Federal Permitting Improvement Steering Committee.

The staff and I continue to look forward to working with you and our other stakeholders as we implement these plans for improving the NEPA review process at the NRC. Staff are working diligently to streamline and enhance our environmental review process and stakeholder engagement is a vital part of this process. If there are any questions on this matter, please contact Kenneth Erwin, at [kenneth.erwin@nrc.gov](mailto:kenneth.erwin@nrc.gov).

Sincerely,

John R. Tappert, Director  
Division of Rulemaking, Environmental,  
and Financial Support  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: RESPONSE TO NEI RECOMMENDATIONS FOR STREAMLINING  
ENVIRONMENTAL REVIEWS FOR ADVANCED REACTORS

DATE: June 10, 2020

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**\*via email**

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