NUCLEAR INNOVATION ALLIANCE

November 9, 2026

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

Subject: Public Comment for Regulatory Enhancements for Reactor Licensing, Decommissioning, and Operational Oversight (Docket ID NRC-2025-1138; RIN 3150-AL45)

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, Regulatory Enhancements for Reactor Licensing, Decommissioning, and Operational Oversight, published on September 24, 2026. The proposed rule adds clarity and eliminates redundancy through different regulations. NIA is generally supportive but has some concerns about the eliminations of certain reporting requirements and consistency between regulations.

Summary of key points

- NRC must ensure consistency of definitions across all rulemakings.
- NRC should reconsider the proposed elimination of some reporting requirements. Some of the proposed changes may undermine public confidence.
- Aligning decommissioning pathways in Part 50 and 52 will be beneficial. NRC should ensure that changes to the public meetings on the Post-Shutdown Decommissioning Activities Report and License Termination Plan prioritize the local stakeholders.
- NIA is supportive of the changes to the Financial Qualifications Requirements for 10 CFR Parts 50 and 52 applicants to conform them with Part 53.
- NIA continues to recommend that DG-4036 be modified to allow alternative approaches to the evaluation of external hazards, if justified by the applicant.
- NRC must verify that the requirements for effluents are consistent across rules.

Part 21 Clarifications

NRC is proposing to amend five definitions including "dedicating entity" and "basic component." These changes overlap with the changes to Part 21 definitions that were proposed previously in the rules, Modernizing Licensing, Oversight, and Siting; and Modernizing Materials Licensing. For "dedicating entity," the definition was specifically adjusted to separate the definition based on the type of regulated facilities and required quality assurance program. The proposed change states it will align with the proposed change in both rules. As none of these rules has been finalized yet, it is imperative that the NRC track any changes made to the definition before finalizing the rules.

Reporting Requirements for Nonemergency Events for Nuclear Power Plants

In this section of the proposed rule, one of the changes is to:

> "eliminate § 50.72(b)(3)(v) requirements for licensees to notify the NRC of an event or condition that, at the time of discovery, could have prevented the fulfillment of the safety function of structures or systems that are needed to shut down the reactor and maintain it in a safe shutdown condition, remove residual heat, control the release of radioactive material, or mitigate the consequences of an accident."

NRC states that the reports are infrequent and "the routine follow-up of plant issues already performed by resident inspectors is sufficient to ensure that the NRC takes appropriate near-term actions in response to these events." The rationale for dropping (b)(3)(v) relies, at least in part, on resident follow-up, and that rationale will not carry over to future sites that may not have one.

Currently there are no plants licensed that do not have a resident inspector, but in the future, there may be advanced reactors that fall into that category. NIA is concerned that the NRC has not considered future sites that may not have a resident inspector to perform the routine follow-up that the proposed rule indicates is sufficient. Furthermore, NRC states "the proposed changes are not intended to increase the workload of resident inspectors or require resident inspectors to gather, verify, or communicate information beyond what is done through existing inspection activities." The NRC has significantly reduced the number of hours spent on the Reactor Oversight Process while simultaneously shifting more responsibilities to inspectors. NIA has concerns about the current work scope of the residents and how NRC will ensure the revisions will maintain adequate protection without increasing the inspectors' workload.

Additionally, the NRC is proposing to remove the reporting requirements in Section 50.72(b)(2)(xi)[1] and 50.72(b)(3)(xii).[2] NIA has concerns about the effects of this proposed change on public confidence. If NRC is unaware of an event or situation that falls under this reporting category, the NRC will not be able to respond to questions from the public about it. Given that NRC has indicated these reports are infrequent, it would seem retaining this requirement would not be burdensome, while continuing to foster public trust.

Decommissioning Licensing Enhancements

In 2007, the NRC amended Part 52 to include provisions analogous to the decommissioning sections in Part 50 but only referenced §§ 50.51 and 50.82. These sections did not include requests for partial site release. Part 53 included a partial site release provision in § 53.1080. NIA is supportive of the proposed change that would correct the exclusion of partial site release from Part 52 by including a new § 52.111 "to add a specific provision for release of part of a site for unrestricted use before license termination for 10 CFR part 52 licensees." The language in proposed § 52.111 is nearly identical to the language in § 50.83. NIA is pleased to see a clear effort toward consistency across the different licensing pathways.

The proposed rule would change the locality requirement for NRC public meetings on the Post-Shutdown Decommissioning Activities Report, License Termination Plan, or a partial site release request. NRC clearly states that public meetings will still be a requirement. NIA is supportive of ensuring the public meetings are still held but encourages NRC to prioritize questions and comments from local stakeholders and citizens. By creating a virtual meeting, more members of the public outside of the affected communities could join these meetings, potentially outnumbering the local community. Various interest groups have a broad geographic presence across the United States. Beyond the technical opportunities these meetings bring, they also are a way for the licensee, NRC, and community to build a trusting relationship. NRC should identify a way to prioritize local stakeholders at these meetings.

Financial Qualifications and Decommissioning Trust Fund Use

NIA agrees with the conforming changes to the Financial Qualifications Requirements for 10 CFR Parts 50 and 52 applicants with Part 53. These changes would replace the current "possesses or has reasonable assurance of obtaining the funds necessary" financial qualifications standard in § 50.33(f)(1) and (2) with the Part 53 "appears to be financially qualified" financial qualifications standard.

---

[1] The requirement to notify the NRC of an event or situation related to the health and safety of the public or onsite personnel, or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made.

[2] The requirement to notify the NRC of an event requiring the transport of a radioactively contaminated person to an offsite medical facility for treatment.

The proposed rule also would adjust the use of the decommissioning trust fund (DTF). The changes would explicitly allow the use of DTFs during "operations for radiological decommissioning activities, including, but not limited to, major radioactive component disposal, under certain defined circumstances." NIA recommends NRC clearly define these circumstances in the rule language or, at a minimum, in the guidance. As of now, despite the proposed language pointing to "certain defined circumstances," these circumstances are not defined anywhere. The ambiguous language could make it hard for licensees to understand appropriate uses for the DTF.

Risk Informed Seismic Design

NIA has previously commented on Seismic Design in both the Modernizing Licensing, Oversight, and Siting and Part 57 proposed rules. When the proposed rule, Modernizing Licensing, Oversight, and Siting was published, a proposed guidance document, draft regulatory guide DG-4036 Graded Approach to Site Characterization for New Reactor Applications, was also published. DG-4036 retained the language from the proposed Part 57 guidance NUREG-2271. NIA reiterates our comments on the NUREG-2271 and prior DG-4036 with respect to reactor site criteria. Nuclear siting category (NSC)-1 through NSC-5 dose thresholds and seismic design category (SDC) mappings appear only in the DG, 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 in 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 again recommends that DG-4036 be modified to allow alternative approaches to the evaluation of external hazards, if justified by the applicant.

Currently, Appendix S to Part 50 only allows for use of "a single design basis ground motion (DBGM), referred to as the safe-shutdown earthquake ground motion (SSE), and imposes a minimum peak ground acceleration (consistent with the highest risk level) for the response spectrum at the foundation level of structures." The proposed Modernizing Licensing, Oversight, and Siting rule refers to Appendix S but did not make any changes to it. The current proposed rule, Regulatory Enhancements for Reactor Licensing, Decommissioning, and Operational Oversight, makes several edits to Appendix S. NRC states that DG-4036:

> "would support changes to 10 CFR part 100, 'Reactor Site Criteria,' in the proposed rule, 'Modernizing Reactor Licensing, Safety Oversight, and Siting Practices,' would provide guidance on determining appropriate DBGMs for a facility based on the potential consequences from a design basis seismic event. This proposed rule would modify appendix S to allow use of these risk-informed approaches under 10 CFR parts 50 and 52."

NRC must ensure that the changes made to Appendix S do allow the approaches for site criteria under Parts 50 and 52. There is risk of inconsistencies if the updates are not made at the same time and with respect to each other.

Environmental Reviews of Early Site Permits

The proposed rule notes that the current regulations in §§ 52.18 and 53.1149(a) require NRC to prepare an environmental impact statement as part of an early site permit review. NRC proposes "to remove this requirement, thereby providing the NRC with flexibility to appropriately establish the scope of the environmental review in accordance with the applicable provisions of the NRC's environmental protection regulations in 10 CFR part 51 and recent amendments to NEPA." This proposed rule does not state that recent changes to Part 51 were in a proposed rule that has not been finalized.[3] While the proposed changes in this Regulatory Enhancements rule could be acceptable, the changes to Part 51 across all relevant NRC rulemakings must be consistent when finalized. NIA has been supportive of using categorical exclusions and generic analyses where the record supports them, but NRC needs to ensure the option of forgoing an environmental impact assessment for an ESP is correctly bounded and aligned with any finalized changes to Part 51.

Record Keeping and Reporting Requirements

NRC is proposing to add the following to § 70.59:

> "Should the annual radiation doses to the public, resulting from the release result in an estimated total effective dose equivalent, or total effective dose [TEDE], as applicable, of more than 25 mrem per year, or if quantities of radioactive materials released during the reporting periods are significantly above the licensee's design objectives previously reviewed as part of the licensing action the licensee shall submit a report."

The proposed Modernizing Radiation Protection Framework rule also adjusts the TEDE to 25 mrem for effluents. NIA notes that several public comments were submitted on the proposed rule in opposition to the change to 25 mrem for effluents. In our prior comment on the Radiation Protection proposed rule, NIA noted there could be potential conflict from changing effluents to 25 mrem if the change is not coordinated with the Environmental Protection Agency (EPA).[4] NIA previously recommended that NRC coordinate with the EPA on this change and provide a public record of that coordination to ensure that any change is durable and provides certainty. As these two proposed rules are finalized, the radiation protection framework must be consistent to avoid misalignment between the two rules.

---

[3] See NIA's Comment on Implementation of the National Environmental Policy Act | NIA

[4] See NIA's Public Comment on NRC's Proposed Rule, Reforming and Modernizing the Radiation Protection Framework

NRC Request for Comment Questions

The table below provides NIA's responses to some of the NRC's specific requests for comment. NIA focused on addressing NRC questions in areas that could benefit the most from NIA expertise, so not every question is addressed.

Question	NIA Response
Question 2: For new 10 CFR part 70 licensees, does the new definition for "basic component" provide clarity on the extent to which commercial grade dedication activities should be performed? Please provide a basis for your response.	NIA finds the new definition is helpful for providing clarity but urges the NRC to ensure any comments made on the definition in the proposed Modernizing Licensing, Oversight, and Siting rule are addressed in this context as well.
Question 3: For new and existing 10 CFR part 70 licensees, do the rulemaking changes, especially the new definition of "basic component," add regulatory clarity and reduce burden or introduce unintended consequences such as additional burden and implementation concerns? Can the unintended consequences be mitigated by implementation guidance and outreach efforts? Please provide a basis for your response.	See response to question 2. As for mitigating the unintended consequences, guidance is always helpful. NRC should collect information from licensees and provide guidance with examples of possible unintended consequences and how to mitigate them.
Question 4: The NRC has proposed concurrent rulemakings that could allow for other quality assurance frameworks. Should 10 CFR part 21 be expanded to be more inclusive of those quality assurance frameworks?	Yes, in the following areas: The proposed rule includes a reference to Appendix T for the definitions, but the § 21.21 reporting trigger still reads "conducted under the requirements of appendix B." This provision could be re-worded to refer to the licensee's approved QA program. While Part 70 does not mandate specific QA program requirements (such as 10 CFR 50 Appendix B), plutonium and reprocessing facilities still require Appendix B or T for those licensees. Section IV.C of the preamble says all Subpart H fuel facilities, including plutonium processing and reprocessing, may use a dedicating entity whose program is "compliant with the licensee's approved configuration management program or

	management measure program." The text and preamble need reconciling. NIA suggests that framework-neutral wording (for example, "a QA program approved by the NRC under this chapter") would avoid amending Part 21 for each new framework. NIA also notes, as elsewhere, that several concurrent rules are still proposals, so expanding Part 21 now risks hard-coding unsettled text.
Question 5: For new and existing power reactor licensees, do the rulemaking changes, especially the new definition of "dedicating entity," add regulatory clarity and reduce burden or introduce unintended consequences such as additional burden and implementation concerns? Can the unintended consequences be mitigated by implementation guidance and outreach efforts? Please provide a basis for your response.	NIA finds the new definition of dedicating entity is helpful for providing clarity but urges the NRC to ensure any comments made on the definition in the proposed Modernizing Licensing, Oversight, and Siting rule are addressed in this context as well.
Question 11: The regulations in 10 CFR parts 52 and 53 allow a manufacturing license to reference a standard design certification. Additionally, a construction permit, operating license, or combined license issued under 10 CFR parts 50, 52, or 53 may authorize the construction or use of a manufactured reactor under such a manufacturing license. Should the NRC revise its regulations in 10 CFR parts 50, 52, or 53 to clarify the applicability of the backfitting and issue finality provision under these circumstances? Please provide the basis for your response and identify the specific matters that should be addressed under each of the relevant backfitting and issue finality regulations.	Yes, clarification would be helpful regarding which rule applies when an NRC-imposed change involves a manufactured reactor. Proposed § 50.109(a)(2) says the backfitting rule does not apply to design matters resolved in a referenced standard design certification rule (i.e., those governed by § 52.63, or by any backfitting limit in the design certification rule itself) or to matters resolved in the manufacturing license proceeding (under § 52.171). The text does not say explicitly whether a certification change applies to a manufactured reactor; and under § 52.63(a)(1) and § 53.1263(a)(1), certified design information can be changed by rulemaking on six grounds: adequate protection, burden reduction, supplying design acceptance criteria detail, correcting material errors, a cost-justified substantial safety increase, and standardization. In contrast, under the proposed §§ 52.171(a)(1) and 53.1288(a)(1), the manufactured reactor

	design can be changed on only two grounds: adequate protection and burden reduction. While § 53.1263(a)(3) applies a certification change to "all plants referencing the certified design," §§ 52.171 and 53.1288 (for a manufacturing license) are more specific provisions and arguably would be hollow if a certification rulemaking could override them on the four additional grounds. Additionally, while somewhat editorial, Part 52 says "the design or manufacturing of a nuclear power reactor under a manufacturing license," while Part 53 says "the design of a manufactured reactor, or the requirements for the manufacture of a manufactured reactor." NRC should consider making this wording more consistent.
Question 13: Do stakeholders agree that applying the § 50.59 change control process to SDA holders is appropriate and consistent with the intent of the regulation? Please provide a basis for your response.	Yes. However, § 50.59 was written for operating plants and the analogs for an SDA are not perfect; "procedures" and "tests and experiments" may vary for SDAs, and the rule should state that, for an SDA holder, § 50.59 covers changes to the approved design and defines "facility" as the approved design.
Question 14: Are there unique challenges or considerations for SDA holders in implementing § 50.59 compared to licensees? Please provide a basis for your response.	While the applicability of § 50.59 is positive, some implementation challenges should be addressed in the rule or accompanying guidance. Several §50.59(c)(2) criteria, such as accident frequency and dose consequences, are evaluated against actual plant conditions. An SDA is evaluated against postulated site parameters. A design change made by the reactor designer could expend margin that a particular site might later wish to use. Accordingly, any changes that could alter the site parameter envelope should be made with this consideration in mind. As discussed in the response to Question 18, it is important that downstream site applicants are notified of any such changes.

	Additionally, as discussed in the response to Question 13, an SDA holder has no operating procedures, tests, or experiments. NRC should consider limiting the final rule to design changes.
Question 15: Is the proposed recordkeeping requirement for SDA holders under § 50.71 sufficiently clear and achievable? Please provide a basis for your response.	NIA is supportive of the recordkeeping requirement for SDAs under § 50.71 because it is reasonable and achievable for license holders.
Question 16: Are there alternative approaches to documenting and retaining design changes that would reduce burden while maintaining transparency? Please provide a basis for your response.	With respect to this particular provision, NIA believes there are other already existing mechanisms to facilitate recordkeeping and access to the records. It is important that NRC maintain transparency with respect to all rulemakings and recordkeeping.
Question 18: How will the proposed changes affect applicants who reference an SDA in a combined license or design certification application? Please provide a basis for your response.	§ 52.145(f) requires applicants to update their applications for changes the SDA holder made under § 50.59 or § 52.145(d), but the applicant does not control those changes. During a multi-year review, the SDA holder could change the design after the site application is filed. NRC needs to add a provision to ensure that applicants referencing an SDA are notified of changes within a stated period of each change and are provided the written evaluations on request. Additionally, an SDA holder's later changes should not apply to an issued license unless the licensee requests an amendment.
Question 19: Are existing NRC guidance documents (e.g., RG 1.187, RG 1.70) sufficient to support implementation of the proposed changes or are there any specific updates or new guidance that stakeholders would find helpful?	RG. 1.70 primarily pertains to licensing processes under Part 50 and provides detailed guidance in preparing applications for construction permits and operating licenses for new nuclear power plants. Specifically, the title of the RG designates it as a light water reactor edition. While there are some areas that can be carried over to other types of new reactors, it would be beneficial if NRC either updated or created new guidance suited for non-LWRs. This is especially important as some of the changes proposed in this rule rely on resident inspector monitoring, which may not be realistic at some future reactor sites. RG 1.70 is an example of where different guidance would be needed for future reactors.

	Similarly, owing to the expansion of the scope of 50.59, an update to RG 1.187 is almost certainly called for (including, for example, addressing the comments above regarding applicability to SDAs).
Question 20: Should the NRC consider expanding the applicability of § 50.59 to other 10 CFR part 52 licensing instruments (e.g., manufacturing licenses)? Please provide a basis for your response.	NIA evaluated the possibility of using 50.59 for Part 52.157 in its comment on the proposed Modernizing Licensing, Oversight, and Siting rule. With respect to operational programs, establishing change control provisions for other operational programs in the manufacturing license (ML), where needed, is a logical approach. However, given the level of detail typical in most operational program descriptions in an application, the programmatic nature of these operational programs, and the low likelihood of most operational programs having a significant impact on the safety basis, NIA continues to recommend that optional submittals have as straightforward and predictable change control process as possible. While the requirements of 10 CFR 52.157 would not necessarily apply (i.e., to non-FSAR information submitted under 10 CFR 52.158), the use of 10 CFR 50.59 criteria for evaluating changes to the operational programs is also a logical framework for establishing these change control processes.
Question 21: Currently, power reactor facility licensees may prepare, proctor and grade the written examinations required by § 55.41 and § 55.43 and may prepare the operating tests required by § 55.45 (i.e., the dynamic simulator scenarios and the plant walkthrough), subject to certain conditions contained in § 55.40 (b). The NRC proposes to provide power reactor and non-power reactor facility licensees the option of proctoring and grading the operating tests. What benefits and challenges could such flexibility introduce and how could the NRC adapt accordingly? Please provide a basis for your response.	NIA notes that the licensee is already responsible for processes and documentation with significantly greater safety significance than operator exams. All aspects of the process would be available for audit/inspection by the NRC. Therefore, NIA is supportive of this proposed change.

Question 23: The NRC is particularly interested in comments and supporting rationale from the public on the continued relevance of the plant walkthrough as part of the operating test for power reactor applicants and proposed recommendations related to potentially modifying or removing the requirement. If the requirement was modified or deleted for power reactor applicants, the NRC would expect to revise the guidance in NUREG-1021 (e.g., re-evaluate grading for job performance measures, and potentially increase the number of control room systems and/or administrative job performance measures). Should the NRC eliminate or amend the plant walkthrough requirement as part of the operating test administered to applicants at power reactors, and if so, what revisions should the NRC make to NUREG-1021? Please provide a basis for your response.	NIA firmly believes there is no substitute for hands-on training for operators. A physical plant walkthrough provides proximity-awareness that virtual reality cannot achieve. NIA does not recommend modifying the requirement.
Question 29: For government agencies, academic institutions, and public interest organizations: The proposed rule includes several changes to reporting requirements related to security plan updates, FSAR updates, quality assurance plan updates, and effluent reporting. How would the elimination of certain reporting requirements and reduced accessibility to related records affect situational awareness for State and local officials, public communication, or research efforts? Please describe any anticipated impacts on your ability to monitor, analyze, or respond to nuclear-related events, including potential costs or limitations to public transparency, academic study, or emergency preparedness.	NIA has long supported a transparent NRC that bolsters public trust. The proposed rule increases efficiency and reduces burden for licensees. However, the changes to reporting requirements mentioned earlier in the comment would reduce transparency because the public will lose access to records that have been historically accessible. NRC has been unique in its practice of providing this public access as many other industries do not allow the same access. The proposed changes could undermine public trust in addition to potentially hindering communication across researchers or stakeholders.
Question 30: For government agencies, public interest organizations, and industry stakeholders: The NRC is proposing to eliminate some reporting requirements but is electing to retain the requirement to submit summaries of security plan changes and changes in the physical protection plan, and safeguards contingency plan for material in transit made	NIA is supportive of retaining the reporting requirements for submitting changes to the security plan, physical protection plan, and safeguards contingency plan. As previously discussed, new duties have recently been added to inspectors' scope of work. Requiring the request of current plans would increase time spent on the request and additional time spent analyzing

without prior NRC approval. The NRC is seeking comments on the implications of preserving or eliminating these requirements. Does the retention of these requirements aid in public transparency, support state and local official situational awareness, and for the purposes of oversight, policy formulation, and/or emergency response sufficiently justify the associated cost burden on licensees? In retaining the requirement to report security plan and physical protection plan and, for material in transit, safeguard contingency plan, the NRC considered the potential savings of a change to the requirement, balanced with a potential increase in inspection resources. For example, if reporting were no longer required, inspectors would be required to request the current plans as a part of inspection preparation from licensees prior to conducting the inspection. The NRC considered this to be an overall increase in NRC and licensee resources. Please provide feedback if you disagree with this assessment.	the documents prior to inspection. If the inspector continued to remain up to date on the summaries of changes, they would have a better understanding prior to inspection and thus spend less time preparing. It would not be an efficient use of time for inspectors to have to request all the information prior to inspection. NIA agrees with NRC that this would overall increase resources for both NRC and the licensee.
Question 31: For government agencies, public interest organizations, and industry stakeholders: The NRC is proposing to eliminate the requirement for licensees to submit reports of emergency plan changes made without prior NRC approval within 30 days of implementation. The NRC is seeking input on whether the removal of this timely reporting and documentation requirement could affect the ability of offsite response organizations, local governments, and the public to remain informed about modifications that may influence emergency response coordination or protective action strategies. In considering this change, the NRC acknowledges that, in the event of an incident, the absence of readily accessible records of emergency plan changes could hinder communication and delays response efforts. However, due to the unlikely event of an emergency, and the ability to readily receive a copy of the current report, the impact would be minimal. Stakeholders are	NIA has consistently advocated for transparency at the NRC to the maximum extent practical. This is especially important for emergency response, where local governments, response organizations and the public must work in partnership with the licensee. The proposed change to eliminate the requirement for licensees to submit reports of emergency plan changes could undermine this essential collaboration. The fact that an emergency is unlikely is irrelevant; it still must be effectively planned for. NIA recommends that NRC not eliminate the requirement for licensees to submit reports of emergency plan changes made without prior NRC approval.

encouraged to provide feedback on the potential impacts of this proposed change including any concerns related to transparency, situational awareness, and emergency preparedness effectiveness.	
Question 32: The proposed rule includes several changes to reporting requirements. Examples of such changes include the elimination of the requirements for periodic submission of Updated Final Safety Analysis Report (UFSAR) and licensee controlled changes to their security plan. These changes are supported by the experience of the operating fleet in exercising the programs that allow such licensee controlled changes. Advanced reactor licensees would not only lack this experience but are also likely to encounter more frequent updates early in their operating history. Further, certain advanced reactor licensees may not have resident inspectors resulting in potential challenges to the timely availability of key documents (e.g., the UFSAR), especially for mission-critical NRC functions such as incident response. What guardrails or information sharing approaches should the NRC consider to mitigate such situations?	NIA recommends that NRC ensure that any changes to reporting increase efficiency while maintaining a level of safety that is consistent across sites and commensurate with the risk of the facility or activity being regulated. While advanced reactors currently lack operating experience, inherent safety features are expected to obviate the need for reporting certain kinds of information. Similarly, if NRC determines a site does not need a resident inspector, that also implies a level of safety that obviates the need for physical access to certain kinds of information. That said, given that the licensee is obligated to retain this information, and given the current state of information technology, ready access to information should not be a challenge such that additional regulatory guardrails are necessary.

Conclusion

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

Sincerely,
Judi Greenwald
President & CEO
Nuclear Innovation Alliance