

**BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE • HEALTHY ENVIRONMENT ALLIANCE OF UTAH
NUCLEAR INFORMATION AND RESOURCE SERVICE • SAN LUIS OBISPO MOTHERS FOR PEACE
SNAKE RIVER ALLIANCE • TENNESSEE CHAPTER SIERRA CLUB • TENNESSEE ENVIRONMENTAL COUNCIL**

January 24, 2020

VIA Federal Rulemaking Website (<https://www.regulations.gov>)

Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Program Management, Announcements, and Editing Staff

RE: Agency Action Regarding the Exploratory Process for the Development of an Advanced Nuclear Reactor Generic Environmental Impact Statement (Docket ID NRC-2019-0226)

Dear U.S. Nuclear Regulatory Commissioners:

The U.S. Nuclear Regulatory Commission is deciding whether to develop a generic environmental impact statement for the construction and operation of a broad, diverse, and undefined category of advanced nuclear reactors. For the reasons explained below, the Commission should not undertake this generic environmental impact statement because it would be contrary to the National Environmental Policy Act's mandate for informed, transparent decision-making.

The Commission's stated purpose of this effort "is to improve the efficiency of the environmental review process,"¹ but the purpose is arbitrary given it lacks any factual basis. Developing a "generic" environmental impact statement would waste time, money, and resources.

Over the years, the nuclear industry has envisioned a wide variety reactor types and designs all at varying stages of conception and development. The Commission has failed to identify any similarities that would form the basis for a "generic" environment review, including the fuel types, power levels, manufacturing methodologies, anticipated locations, waste storage requirements, water consumption, emergency planning requirements, or cumulative impacts. Ignoring all of these differences would be arbitrary and lead to a meaningless and wasteful environmental review effort.

A generic environmental review also would confuse and hinder meaningful participation of other federal entities, state and local governments, tribal governments, and the public. With no meaningful

¹ 82 Fed. Reg. 62,559 (Nov. 15, 2019).

information to explain the broad array of hypothetical “advanced nuclear reactors,” the Commission would deprive others of the opportunity to participate in a transparent and informed public process.

Indeed, the “advanced reactor” design is nothing more than a hypothetical construct that lacks any technical or environmental foundation, making it impossible to assess the environmental impacts associated with these generic reactors. The speculative nature of the “advanced reactor” category also makes it impossible to conduct the necessary alternatives analysis for the various reactor designs, locations, and uses, as well as the necessary mitigation measures.

Finally, should the Commission decide to proceed with a generic environmental review, it should not include small modular nuclear reactors, such as the NuScale Power, LLC, reactor design in the review. Duplicating the environmental review process across multiple dockets is without question inefficient and unnecessary.

In sum, the undersigned ask the Commission to forgo a generic environmental review of advanced nuclear reactors and instead to conduct its environmental reviews in a manner that ensures informed decision-making. Generic assessments of hypothetical ideas (rather than actual reactor designs and applications) will not improve efficiency and will compromise public understanding.

Sincerely,

Lou Zeller, Executive Director
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