

**Clean Water Action * Environment America * Friends of the Earth
League of Conservation Voters * Natural Resources Defense Council
Sierra Club * Union of Concerned Scientists**

May 17, 2016

Dear Members of Congress:

On behalf of our millions of members and supporters, we write to express concern with the approach being taken towards licensing of advanced nuclear reactors in H.R. 4979 and other similar proposed legislation.

We believe any focus on “expediting and streamlining” NRC licensing for nuclear reactors of any type is misplaced, will do little to facilitate the deployment of advanced reactors in the United States, whatever the well-intentioned purposes of the sponsors of these bills. More importantly this approach, including the development of so-called “risk-informed and performance-based” licensing procedures, could potentially lead to compromises on public safety protections and do grave damage to the agency’s and industry’s environmental obligations.

We have seen no evidence whatsoever that the NRC licensing process is a factor inhibiting advanced reactor deployment. Rather, the main problem for licensing is the cost and difficulty of obtaining the necessary analyses and experimental data to satisfy regulatory requirements and ensure that new reactors can operate safely and do so in a manner that advances the industry’s long inability to meet its waste, proliferation, safety, and cost challenges.

Put bluntly, institutional barriers such as the enormously high cost of construction and operation; the lack of significant utility interest in investing in advanced reactor technology; and the failure of nuclear power entrepreneurs to commit the resources necessary for seeing a project through to the end remain the biggest obstacles to advanced nuclear reactor development and deployment.

Already the National Environmental Policy Act is treated as an afterthought by industry and the NRC and some of the suggested legislation we have seen associated with these efforts would make that worse by imposing strict and unreasonable deadlines on completion of environmental reviews. Rather than go down this road, we urge Congress to strengthen hearing and NEPA requirements so that public and State trust in the industry and NRC can be restored.

Finally, we do not agree with the notion that the NRC’s licensing processes are too stringent and need to be loosened to facilitate deployment of advanced reactors. Rather than take steps in the wrong direction such as those listed above, we urge Congress to focus on steps that would

increase the safety of operating and any future reactors as well as the security, proliferation resistance, environmental protection, and economic viability of the industry as a whole.

Efforts to substantially weaken the hearing and licensing processes for nuclear reactors of any type are unwise, as they can lead to reduced transparency and public participation, and undercut important environmental and public safety protections.

Sincerely,

Clean Water Action

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