



August 15, 2025

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Priorities for Near-Term NRC Reforms

Dear Chairman Wright, Commissioner Crowell, and Commissioner Marzano,

The Nuclear Innovation Alliance (NIA) is a persistent advocate for increasing the efficiency and effectiveness of the Nuclear Regulatory Commission (NRC) as the gold standard nuclear safety regulator. Given the ambitious nuclear energy directive timelines delineated in recent executive orders and the NRC's constrained resources, the NIA advises the NRC to focus on the following recommendations, listed in priority order:

1. The NRC should align new reactor licensing schedules to reflect the quality of the application, the maturity of the technology, and the benefit of targeted pre-application engagement. For complete, high-quality applications, the NRC should complete the acceptance review within 30 days of receipt and docket only those that meet this standard. Once docketed, the NRC should commit to the following review schedule:
 - a. For a high-quality Construction Permit Application (CPA) for an Nth-of-a-kind reactor, or a high-quality Combined License Application with a previously approved Design Certification: up to 12 months
 - b. For a high-quality CPA for a first-of-a-kind (FOAK) reactor with targeted pre-application engagement: up to 18 months
 - c. For a high-quality CPA for a FOAK reactor without targeted pre-application engagement: up to 36 months
2. The NRC should collaborate with the Department of Energy (DOE) and the Department of Defense (DoD) to promote consistent safety standards, minimize duplication of effort, and ensure a smooth transition from DOE and DoD authorization of reactors to NRC licensing of commercial reactors.
3. Per our July 30, 2025 letter,¹ the NRC should consider expanding the non-power production and utilization facility (NPUF) approach to power reactors through some combination of the following: (1) a half-day workshop to solicit stakeholder feedback on this concept; (2) multiple rapid pilots; and (3) a direct final rulemaking to clarify terminology.

In addition, the NIA recommends the expeditious resolution of the following pending actions:

4. **SRM-SECY-21-0098**, *Generic Environmental Impact Statement for Licensing of New Nuclear Reactors*

¹ [NIA Input on NRC Actions on Low-Consequence Reactors](#)

5. **SRM-SECY-20-0065**, *Rulemaking on Categorical Exclusions under the National Environmental Policy Act*
6. **SRM-SECY-24-0046**, *Implementation of the Fiscal Responsibility Act of 2023 National Environmental Policy Act Amendments*
7. **SECY-24-0011**, *Final Rule: Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning*
8. **SECY-24-0014**, *Final Rule: Alternatives to the Use of Credit Ratings*
9. **SECY-24-0069**, *Final Rule: Harmonization of Transportation Safety Requirements with International Atomic Energy Agency Standards*
10. **SECY-24-0049**, *Proposed Rule: Reporting Requirements for Nonemergency Events at Nuclear Power Plants*
11. **SECY-25-0052**, *Nth-of-a-Kind Microreactor Licensing*
12. **SRM-SECY-18-0055**, *Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning*
13. **SECY-16-0106**, *Licensing Requirements for Land Disposal of Radioactive Waste (10 CFR Part 61)*

Lastly, in response to the Nuclear Energy Institute's (NEI) July 2025 report titled, *Accelerating NRC Reform: Industry Recommendations*,² the NIA recommends prioritizing the following actions. The headers and sub-headers align with *Tier 2* supporting information in NEI's report.

Reform New Nuclear Licensing

14. Create a High Volume Licensing³ Path
15. Modernize Siting Criteria

Reform NRC Licensing

16. Streamline NRC Hearings
17. Modernize Environmental Review Processes
18. (*Continue to*) Reform the Advisory Committee on Reactor Safeguards⁴
19. Streamline License Renewal Regulations

These priorities reflect NIA's assessment of measures that can be implemented promptly to support new nuclear reactor licensing.

If you have any questions, please contact Brittany Lutz at: blutz@nuclearionnovationalliance.org

Best,

Judi Greenwald

President and CEO

² [Accelerating NRC Reform: Industry Recommendations | ML25213A112 | NRC.gov](#)

³ [Enabling High Volume Licensing of Advanced Nuclear Energy](#)

⁴ [Improving the Effectiveness and Efficiency of the Advisory Committee on Reactor Safeguards](#)