



July 17th, 2026

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

Subject: Request for an Extension of Comment Period for Modernizing Reactor Licensing, Safety Oversight, and Siting Practices Rulemaking (Docket ID NRC-2025-0975; RIN 3150-AL44)

Dear NRC Staff,

The Nuclear Regulatory Commission (NRC) is currently requesting comments on the proposed Modernizing Reactor Licensing, Safety Oversight, and Siting Practices rulemaking. This rulemaking covers an enormous breadth of regulatory areas including risk-informed and performance-based acceptance criteria, license renewal, construction permits, and quality assurance. Notably the Public Inspection document on the Federal Register is 507 pages.¹

Due to the length of the proposed rule and the importance of the rulemaking, the Nuclear Innovation Alliance (NIA) requests that the public comment period be extended an additional 30 days for a total of 76 days, pushing the end of public comment period to September 30th, 2026. NIA is requesting an extension to the public comment period due to the breadth, depth, and overall length of the proposed rule, the timing of the comment period with other EO 14300 proposed rulemakings, and the importance to the rulemaking process including stakeholder feedback. NRC extension of the public comment period will enable NIA to develop and provide more detailed and specific comments to NRC staff on the proposed rule and respond to as many of the 42 “Specific Questions” posed by NRC staff in the proposed rule as possible.

NIA has previously noted the importance of several of the topics in this rulemaking in our August 2025 letter [*Priorities for Near-Term NRC Reforms*](#). We look forward to providing detailed comments after completing a thorough review of the proposed rule. NIA also believes that the extension of the public comment period will enable more robust public engagement from a larger number of other key stakeholders. Additionally, NRC has already noticed three public meetings to discuss the various sections of the rulemaking. NIA is pleased to see numerous

¹ <https://public-inspection.federalregister.gov/2026-14341.pdf?1784119521>

opportunities for stakeholder engagement. We believe the need for three separate meetings emphasizes the breadth of the rule and need for a public comment period extension.

An effective public comment period is critical to incorporating diverse stakeholder input and building public confidence in a new rule. This is especially important as the NRC is in the middle of a massive rule rewrite as directed by EO 14300. Also, these rules are now required to undergo Office of Information and Regulatory Affairs (OIRA) review. The current implementation of the OIRA process is preventing public knowledge on the draft rules until after OIRA review. With respect to this rule, prior to its publication there was no clear description of its scope, and many stakeholders were surprised by the number and significance of topics it covered.

We thank NRC staff, management, and the Commission for their continued efforts to develop innovative new regulatory frameworks. If you have any questions regarding this letter, please contact Miranda McGuire at mmcguire@nuclearinnovationalliance.org.

Sincerely,
Judi Greenwald
President & CEO
Nuclear Innovation Alliance