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POLICY ISSUE (Notation Vote)

March 25, 2022

SECY-22-0024

FOR: The Commissioners

FROM: Daniel H. Dorman
Executive Director for Operations

SUBJECT: RULEMAKING PLAN FOR RENEWING NUCLEAR POWER PLANT
OPERATING LICENSES—ENVIRONMENTAL REVIEW
(RIN 3150-AK32; NRC-2018-0296)

PURPOSE:

The purpose of this paper is to respond to the staff requirements memorandum (SRM) SRM-SECY-21-0066.¹ This paper requests Commission approval to initiate a rulemaking to amend Table B-1, "Summary of Findings on NEPA [National Environmental Policy Act] Issues for License Renewal of Nuclear Power Plants," in Appendix B, "Environmental Effect of Renewing the Operating License of a Nuclear Power Plant," to Subpart A, "National Environmental Policy Act—Regulations Implementing Section 102(2)," of Part 51 of Title 10 of the *Code of Federal Regulations* (10 CFR), "Environmental Protection Regulations for Domestic

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¹ "Staff Requirements—SECY-21-0066—Rulemaking Plan for Renewing Nuclear Power Plant Operating Licenses—Environmental Review (RIN 3150-AK32; NRC-2018-0296)," dated February 24, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22053A308).

Licensing and Related Regulatory Functions.” NUREG-1437, Revision 1, “Generic Environmental Impact Statement for License Renewal of Nuclear Plants,” issued June 2013 (LR GEIS), provides the technical and regulatory bases for Table B–1. Consequently, this paper also requests approval to update the LR GEIS. The updates to the LR GEIS and Table B–1 would fully account for one term of subsequent license renewal (SLR) by conducting a thorough evaluation of the environmental impacts of SLR in the LR GEIS. The proposed rulemaking would align with the Commission’s Order, CLI-22-03, and recent decisions in *Turkey Point*, CLI-22-02, and *Peach Bottom*, CLI-22-04, regarding the agency’s NEPA analysis of SLR applications. Additionally, the proposed rulemaking would remove the word “initial” from 10 CFR 51.53(c)(3) and update associated guidance accordingly to reflect the changes to 10 CFR Part 51 and the update to the LR GEIS.

SUMMARY:

As directed in SRM-SECY-21-0066, this proposed rule would remove the word “initial” from 10 CFR 51.53(c)(3) and revise the LR GEIS, Table B–1, and associated guidance to apply to one 20-year term of SLR.

BACKGROUND:

The primary purpose for the LR GEIS is to identify all NEPA issues for license renewal and evaluate those environmental impacts considered to be generic to all nuclear power plants, or a subset of plants. The LR GEIS also identifies issues that need to be addressed in site-specific environmental reviews for nuclear power plant license renewals. The U.S. Nuclear Regulatory Commission (NRC) documents these reviews in supplemental environmental impact statements to the LR GEIS.

The NEPA issues evaluated in the LR GEIS and listed in Table B–1 are characterized as either Category 1 or Category 2. Category 1 issues are considered generic, as the impacts have been found to be essentially the same or similar at all, or a subset of, nuclear plants. Category 1 issues are not re-evaluated in nuclear power plant site-specific environmental reviews absent new and significant information. Category 2 issues are required to be addressed in each nuclear power plant site-specific environmental review. The findings in the LR GEIS on NEPA issues for license renewal of nuclear power plants are summarized in Table B–1.

Additionally, to support the staff’s environmental review, license renewal applicants must prepare an environmental report under 10 CFR 51.53(c). That section directs applicants for “initial” license renewals to analyze Category 2 issues and rely on Table B–1 and the LR GEIS for Category 1 issues. The staff uses the information in that environmental report to analyze Category 2 issues in the site-specific supplement to the LR GEIS.

The LR GEIS and Table B–1 have generally been effective in focusing license renewal environmental reviews on important site-specific issues and concerns at each nuclear power plant site, thus increasing the overall efficiency of the NRC’s environmental review.

In adjudicatory decisions, the Commission determined that the analysis in the LR GEIS did not address subsequent license renewals. Thus, in SRM-SECY-21-0066, which accompanied the recent decisions, the Commission directed the staff to provide a rulemaking plan that would update the LR GEIS and Table B–1 to include a thorough evaluation of the environmental impacts of renewing the operating license of a nuclear power plant for SLR. In revising the

LR GEIS, the NRC staff also would consider the need to modify, add to, consolidate, or delete any of the environmental issues evaluated in the LR GEIS.

The introduction to Appendix B to Subpart A of 10 CFR Part 51 states that, on a 10-year cycle, the Commission intends to review the material in Appendix B, including Table B–1, and update it, if necessary (61 FR 28467; June 5, 1996). Therefore, NRC began the latest review in April 2020, approximately 7 years after the completion of the previous revision cycle in June 2013. Subsequently, the NRC published in the *Federal Register* on August 4, 2020 (85 FR 47252), a scoping notice that indicated the results of the NRC staff’s review and invited public comments and proposals for updating other areas of the LR GEIS. Enclosure 1 to this report summarizes the significant comments and proposals received during the public scoping period. All LR GEIS and associated Table B–1 NEPA issues discussed within this rulemaking plan were included in the completed environmental scoping effort, including updating the LR GEIS to address SLR. As a result, the NRC staff is confident that the completed environmental scoping effort supports the scope for this revised rulemaking plan as directed by the Commission in SRM-SECY-21-0066, and, therefore, the staff does not intend to conduct an additional scoping process. Members of the public; local, State, Tribal, and Federal government agencies; and other stakeholders will have the opportunity to provide comments on the proposed rule, draft LR GEIS, and associated draft guidance. The NRC staff plans to hold a series of public meetings for the purposes of public outreach and to receive comments.

If the Commission directs a new scoping process, the schedule for the LR GEIS update and rulemaking would be extended by several months (4-6 months, depending on length of the scoping period) to accommodate the additional activity.

The following sections present the staff’s proposed rulemaking plan.

DISCUSSION:

Title

Renewing Nuclear Power Plant Operating Licenses—Environmental Review

Regulation

This rulemaking would update the 10 CFR Part 51 environmental protection regulations specific to nuclear power plant license renewal in Appendix B to Subpart A and 10 CFR 51.53(c), and provide necessary underlying updates to the LR GEIS in technical support of the rule.

Regulatory Issue

The LR GEIS provides the technical and regulatory bases for the summary of findings on NEPA issues in Table B–1 in Appendix B to Subpart A of 10 CFR Part 51. In several recent adjudicatory orders, the Commission held that the LR GEIS only addressed the impacts of initial license renewal periods. In SRM-SECY-21-0066, which was issued at the same time as these orders, the Commission directed the staff to provide a rulemaking plan to update the LR GEIS to address SLR and make corresponding amendments to Table B–1 and 10 CFR 51.53(c). This rulemaking plan includes detailed information about the issues needed to address SRM-SECY-21-0066 under “Description of Rulemaking: Scope.”

Existing Regulatory Framework

The existing regulatory framework consists of the following regulations and guidance:

Regulations

- Table B–1 in Appendix B to Subpart A of 10 CFR Part 51
- 10 CFR 51.53(c) (addressing environmental reports for license renewal)
- 10 CFR 51.71(d) (addressing site-specific draft supplemental environmental impact statements)
- 10 CFR 51.95(c) (addressing site-specific final supplemental environmental impact statements)

Technical and regulatory basis document

- NUREG-1437, Revision 1 (LR GEIS)

Guidance

- Regulatory Guide 4.2, Supplement 1, Revision 1, “Preparation of Environmental Reports for Nuclear Power Plant License Renewal Applications,” issued June 2013
- NUREG-1555, Supplement 1, Revision 1, “Standard Review Plans for Environmental Reviews for Nuclear Power Plants, Supplement 1: Operating License Renewal,” issued June 2013

Explanation of Why Rulemaking Is the Regulatory Solution

In the Commission’s Order, CLI-22-03, and recent decisions in Turkey Point, CLI-22-02, and Peach Bottom, CLI-22-04, the Commission determined that the LR GEIS and Table B–1 only covered initial license renewal. Additionally, the Commission found that 10 CFR 51.53(c)(3) only applies to applicants for initial license renewal. As a result, in SRM-SECY-21-0066, the Commission directed the staff to provide a rulemaking plan to update the GEIS, Table B–1, 10 CFR 51.53(c)(3), and associated guidance to thoroughly evaluate the environmental impacts of SLR.

The staff anticipates that the scope of these changes would reduce applicant burden in preparing environmental reports, improve the efficiency of staff environmental reviews, ensure that future environmental reviews meet the “hard look” standard under NEPA, and clearly address the environmental impacts of nuclear power plant subsequent license renewals.

The staff has identified three schedule options for implementing the Commission’s direction in SRM-SECY-21-0066 to expedite this rulemaking. The scope of the rulemaking would be the same in all three options:

- 1) Alternative 1: this rulemaking would be conducted under a streamlined rulemaking schedule using select key staff to lead and oversee the effort. The rulemaking would

address the elements described in “Description of Rulemaking: Scope” below, including removing the word “initial” from 10 CFR 51.53(c)(3) and revising the LR GEIS, Table B-1, and associated guidance to apply to subsequent license renewals. Under this schedule the rulemaking would be completed in 38 months (fiscal year (FY) 2025). The proposed schedule, while aggressive as compared to the NRC’s standard rulemaking schedule, would minimize technical and procedural risks and disruptions to other NRC licensing, programmatic, and rulemaking activities as compared to Alternatives 2 and 3. Schedule execution is predicated on ensuring the availability of key staff in core functional areas. To support the schedule, the staff does not intend to extend the public comment period for the proposed rule and draft LR GEIS.

- 2) Alternative 2: this rulemaking would be conducted on an accelerated (approximately 6 months shorter) schedule and would accomplish all of the objectives specified for Alternative 1. Under this schedule the rulemaking would be completed in 32 months (first quarter of FY 2025). The shortened schedule would entail additional technical and procedural risks. However, these risks could be mitigated in part by allocating additional resources (e.g., use of a dedicated project team and increased contractor support). The assignment of dedicated staff could adversely impact other NRC licensing, programmatic, and rulemaking activities. To support the schedule, the staff does not intend to extend the public comment period for the proposed rule and draft LR GEIS.
- 3) Alternative 3: this rulemaking would be conducted on an even more compressed schedule than under Alternative 2. The faster schedule, as explained below, would add to potential technical and procedural risks. Additional dedicated staff and increased contractor support would be used to support this rulemaking alternative. Under this schedule the rulemaking would be completed in 24 months (FY 2024).

Alternative 1 would provide for an efficient and predictable use of staff resources, while minimizing most technical and procedural risks and disruptions to other NRC licensing, programmatic, and rulemaking activities. For example, following the proposed, expedited rulemaking schedule will facilitate the staff’s efforts to successfully manage and thoroughly respond to the large volume of public comments expected on the proposed rule, revised LR GEIS, and associated guidance through the use of increased contractor support and use of dedicated, key staff in select disciplines. The proposed approach and schedule assumptions will better position the NRC staff to consider late comment submissions during the public comment period on the proposed rule and draft LR GEIS. This alternative will also afford more time dedicated to thorough stakeholder and government-to-government interaction.

Alternative 2, which accomplishes the same rulemaking objectives as Alternative 1, would be accomplished under the accelerated schedule timeline. To successfully implement Alternative 2, the staff proposes to use a dedicated team (“tiger team”) of NEPA environmental technical and project management, rulemaking, cost analysis, and other critical staff (e.g., Senior Executive Service and Office of General Counsel representatives). Key staff would also have defined backups. Despite the use of a dedicated team, the accelerated schedule does carry with it increased risk. The accelerated schedule decreases the amount of time that the staff has to complete the technical analysis and integrate the rule, LR GEIS, and associated guidance documents. Additionally, the assignment of a larger number of dedicated staff within a defined project team for the duration of the rulemaking effort would carry an increased risk of delaying other ongoing or proposed NRC licensing, programmatic, and rulemaking activities (e.g., environmental reviews for initial license renewal, Decommissioning GEIS update as directed by the Commission, among others). Implementation of this alternative would require

increased reliance on contractor support to meet the accelerated schedule milestones, as detailed in Enclosure 2.

Alternative 3, which accomplishes the same rulemaking objectives as Alternatives 1 and 2, would be conducted under an even more compressed schedule timeline (2 years). The compressed schedule carries greater risk because it provides less margin and capacity to address emergent issues and stakeholder requests, and reduces the time available for technical analysis and integration of the components of the rulemaking package. This alternative would also rely on the use of a dedicated team as described in Alternative 2. To minimize the increased risks from the shorter schedule, additional NRC staff and increased contractor resources would be assigned under this alternative as identified in Enclosure 2. Additionally, the assignment of a larger number of dedicated staff within a defined project team for the duration of the rulemaking effort would carry an increased risk of delaying other ongoing or proposed NRC licensing, programmatic, and rulemaking activities (e.g., environmental reviews for initial license renewal, Decommissioning GEIS update as directed by the Commission, among others). Further, this alternative assumes a 1-month Commission's review for each of the proposed rule and final rule and a slightly shorter public comment period (60 days vs 75 days).

To expeditiously restore clarity and reliability to the regulatory framework for license renewal, the staff recommends Alternative 3. The staff would keep the Commission informed of any adverse impacts on other budgeted projects throughout this effort.

Description of Rulemaking: Scope

NEPA requires that "agencies take a 'hard look' at environmental consequences [and] provide for broad dissemination of relevant environmental information." *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350 (1989) (citations omitted). As part of that hard look review, agencies must employ "accurate information and defensible reasoning." *Great Basin Resource Watch v. BLM*, 844 F.3d 1095, 1101 (9th Cir. 2016). The Council on Environmental Quality (CEQ) has promulgated regulations that expound on these concepts. Specifically, as stated in 40 CFR 1502.23, "Methodology and scientific accuracy," "Agencies shall ensure the professional integrity, including scientific integrity, of the discussions and analyses in environmental documents." While the NRC has not adopted all CEQ regulations, the Commission has frequently emphasized that these regulations are entitled to persuasive authority.²

SRM-SECY-21-0066 specifies that the LR GEIS should be updated to clearly include, but not be limited to, a thorough evaluation of the environmental impacts of renewing the operating license of a nuclear power plant for one term of SLR. This rulemaking plan proposes to undertake these updates. In preparing an adequate NEPA document that reflects the "hard look" that is required, the NRC must consider changes to applicable laws and regulations, new data in its possession, or experience in conducting similar environmental reviews (e.g., information obtained from subsequent license renewal reviews performed to date). During its review to prepare for the 10-year update, the NRC staff identified several issues, apart from SLR, that also warranted updating. Upon additional consideration, the NRC staff concludes that a number

² *Pacific Gas & Elec Co.* (Diablo Canyon Nuclear Power Plant, Units 1 and 2), CLI-11-11, 74 NRC 427, 444 (2011) (noting that under its "longstanding policy" the Commission looks "to CEQ regulations for guidance").

of these issues should be addressed in the update to the LR GEIS to ensure that the LR GEIS takes the requisite “hard look” at the environmental impacts of SLR (and continues to also provide an acceptable NEPA analysis of the environmental impacts of an initial license renewal). The next section provides additional detail on these issues. The staff intends to provide recommendations on the remaining issues, not needed to meet the “hard look” standard, in the second rulemaking plan required by SRM-SECY-21-0066.

Subsequent License Renewal Issue

Subsequent license renewals—The staff proposes to re-evaluate the generic effects of license renewal, so the LR GEIS and the NEPA findings in Table B–1 will be applicable to both initial and SLR. This analysis will also support removing the word “initial” from 10 CFR 51.53(c).

Other Issues Required to be Addressed to Determine the Effects of Subsequent License Renewal—Environmental laws, regulations, and requirements can change over time, affecting the findings on NEPA issues summarized in Table B–1. In preparing an adequate NEPA document, the LR GEIS must address recent changes to environmental laws (e.g., the Endangered Species Act), executive orders, and regulations (e.g., CEQ NEPA regulations). Accounting for these changes would ensure that future environmental reviews meet the “hard look” standard under NEPA and accurately address the environmental impacts of nuclear power plant subsequent license renewals.

Additionally, consideration of the following issues would further the staff’s “hard look” at relevant NEPA information for both SLR and initial license renewal terms.

- The staff proposes to evaluate greenhouse gas emissions as a new NEPA issue, and update other NEPA issues as needed, in the LR GEIS to address revised CEQ guidance and add this issue to the summary of NEPA findings in Table B–1.
- Incorporate lessons learned and knowledge gained related to environmental issues from ongoing subsequent license renewal reviews (i.e., groundwater quality degradation and threatened, endangered, and protected species of essential fish habitat).
- Update the LR GEIS to reflect the updated U.S. Department of Energy (DOE) Standard DOE 1153-2019, “Graded Approach to Evaluating Radiation Doses to Aquatic and Terrestrial Biota,” dated February 12, 2019.
- Update the LR GEIS and guidance documents to incorporate guidance related to new and significant information about severe accident mitigation alternatives, Nuclear Energy Institute (NEI) NEI 17-04, and the Final Rule for Mitigating Severe Events at U.S. Reactors.
- Update the LR GEIS and guidance documents to reflect the National Research Council Committee’s revised Biological Effects of Ionizing Radiation VII report, “Health Risks from Exposure to Low Levels of Ionizing Radiation.”
- Consider updating the LR GEIS and the rule to clarify that the generic findings in the LR GEIS and rule are applicable to the 20-year license renewal increment plus the number of years remaining on the current license, up to a maximum of 40 years.

Description of Rulemaking: Preliminary Backfitting and Issue Finality Analysis

This rulemaking does not constitute “backfitting,” as defined in 10 CFR 50.109(a)(1) of the Backfit Rule. This rulemaking does not meet the definition of a backfit, because it does not propose a “modification of or addition to systems, structures, components, or design of a facility; or the design approval or manufacturing license for a facility; or the procedures or organization required to design, construct or operate a facility.” Similarly, this rulemaking does not constitute an action inconsistent with any of the issue finality provisions in 10 CFR Part 52, “Licenses, Certifications, and Approvals for Nuclear Power Plants.” Additionally, this rulemaking would not constitute forward-fitting as that term is defined in Management Directive 8.4, “Management of Backfitting, Forward Fitting, Issue Finality, and Information Requests.”

Description of Rulemaking: Estimated Schedule

The following is the estimated schedule for Alternative 1:

- Deliver proposed rule to the Commission—12 months after receipt of the Commission’s SRM.
- Deliver final rule to the Commission—12 months after the close of a 75-day public comment period for the proposed rule.

The following is the estimated schedule for Alternative 2:

- Deliver proposed rule to the Commission—9 months after receipt of the Commission’s SRM.
- Deliver final rule to the Commission—9 months after the close of a 75-day public comment period for the proposed rule.

The following is the estimated schedule for Alternative 3:

- Deliver proposed rule to the Commission—8 months after receipt of the Commission’s SRM.
- Deliver final rule to the Commission—7 months after the close of the 60-day public comment period for the proposed rule.

Resources and milestone schedules for each alternative are included in Enclosure 2. The staff plans to conduct public meetings for the proposed rulemaking, draft LR GEIS, and associated guidance and is exploring appropriate outreach approaches to solicit diverse feedback (e.g., State and Tribal communication letters).

Description of Rulemaking: Preliminary Recommendation on Priority

Based on the Common Prioritization of Rulemaking methodology (ADAMS Accession No. ML18263A070), this rulemaking activity is ranked high. This activity is a high-priority rulemaking because it would significantly contribute to multiple safety strategies and would significantly improve the efficiency and efficacy of the NRC’s license renewal environmental

reviews (i.e., initial and subsequent) and would respond to expressed direction from the Commission.

Description of Rulemaking: Estimate of Resources

Enclosure 2 of this report presents an estimate of the resources needed to complete this rulemaking. The proposed rulemaking alternatives would result in cost savings resulting from increased efficiency of subsequent license renewal environmental reviews by updating the LR GEIS, regulations, and associated guidance.

Cumulative Effects of Regulation

This rulemaking would have a net positive impact on the cumulative effects of regulation because it would reduce the regulatory burden for both the NRC and license renewal applicants (including subsequent license renewal applicants). The staff would conduct public meetings on the draft LR GEIS, proposed rule, and associated guidance documents; provide sufficient time for public comment; and conduct additional public outreach, as needed.

Additionally, the staff recognizes that other NRC rulemaking projects affect 10 CFR Part 51. The staff would coordinate with these other 10 CFR Part 51 rulemaking activities to limit overlapping attributes and requirements to minimize the cumulative effects of regulation on applicants and licensees.

Agreement State Considerations

This rulemaking would not affect Agreement States. The proposed rule changes are limited to 10 CFR Part 51 environmental protection regulations specific to nuclear power plant license renewals.

Guidance

In conjunction with this rulemaking, the staff would update and revise Regulatory Guide 4.2, Supplement 1, Revision 1, and NUREG-1555, Supplement 1, Revision 1, to incorporate any changes resulting from the LR GEIS and rule update.

Advisory Committee on Reactor Safeguards Review

This rulemaking would be limited to the environmental protection regulations in 10 CFR Part 51 specific to nuclear power plant license renewal, would not involve safety regulations, and, therefore, would not require Advisory Committee on Reactor Safeguards review.

Committee to Review Generic Requirements Review

This rulemaking would be limited to the environmental protection regulations in 10 CFR Part 51 specific to nuclear power plant license renewal. The staff has determined that backfit regulations and issue finality provisions do not apply to this rulemaking, as explained in "Description of Rulemaking: Preliminary Backfitting and Issue Finality Analysis" above, and, therefore, would not require review by the Committee to Review Generic Requirements.

Analysis of Legal Matters

The Office of the General Counsel has reviewed this rulemaking plan and has not identified any issues necessitating a separate legal analysis at this time.

COMMITMENT:

If the Commission approves this rulemaking plan, the staff will proceed to update the LR GEIS and draft a proposed rule for Commission review and approval.

RECOMMENDATION:

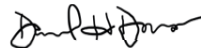
The staff recommends that the Commission approve Alternative 3, to proceed with a rulemaking to update the LR GEIS and amend Table B-1 in Appendix B to Subpart A of 10 CFR Part 51; remove the word "initial" from 10 CFR 51.53(c)(3); conduct a thorough analysis of the environmental impacts of subsequent license renewal to expand the applicability of the LR GEIS; consider changes to applicable laws and regulations, new data, and experience in conducting similar environmental reviews; and update associated guidance for consistency.

RESOURCES:

Enclosure 2 includes an estimate of the resources needed to complete this rulemaking.

COORDINATION:

The Office of the General Counsel has no legal objection to this action. The Office of the Chief Financial Officer has reviewed this paper and has no concerns with the estimated resources in Enclosure 2.



Signed by Dorman, Dan
on 03/25/22

Daniel H. Dorman
Executive Director
for Operations

Enclosures:

1. Significant Issues Raised
During Public Scoping Period for the
Review and Potential Update of the
"Generic Environmental Impact
Statement for License Renewal
of Nuclear Plants" (NUREG-1437)
2. Estimated Resources for Renewing
Nuclear Power Plant Operating
Licenses—Environmental Review
Rulemaking

SUBJECT: RULEMAKING PLAN FOR RENEWING NUCLEAR POWER PLANT OPERATING
 LICENSES – ENVIRONMENTAL REVIEW (RIN 3150-AK32; NRC-2018-0296)
 DATED: March 25, 2022

SRM-S21-0066-1

**ADAMS Accession Nos.: Pkg: ML22062B592, SECY: ML22062B643, Enclosure 1:
 ML22062B647, Enclosure 2: ML22062B648** *via Email SECY-012

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