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The Honorable Ho K. Nieh
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

**RE: Comments of the National Association of Manufacturers on NRC's
Rulemaking on Modernizing Reactor Licensing, Safety Oversight, and Siting
Practices (Docket NRC-2025-0975)**

Dear Chairman Nieh:

The National Association of Manufacturers (NAM) respectfully submits these comments on the proposed rulemaking issued by the Nuclear Regulatory Commission (NRC) entitled, *Modernizing Reactor Licensing, Safety Oversight, and Siting Practices* ("the proposed rule" or "the proposal"). The NAM appreciates the opportunity to submit comments on the proposal and supports the NRC's efforts to issue nuclear policies that reflect the modern economy and current energy needs.

The NAM is the voice of the manufacturing community and the leading advocate for a policy agenda that supports and empowers the 13 million people who make things in America. As the largest manufacturing association in the U.S., the NAM's membership includes businesses of all sizes, across all industrial sectors, and in all 50 states. Manufacturers collectively contribute \$2.9 trillion to the U.S. economy—and right-sized, commonsense regulations are critical to sustaining the manufacturing strength that underpins our nation's prosperity.

Manufacturers use one-third of America's energy. As such, the sector needs to be able to produce and use every energy source available to meet this critical moment. In short, manufacturers need American energy dominance, bolstered by an all-of-the-above energy strategy, that allows our industry to innovate, build, and grow here at home. Nuclear energy is a critical piece of that strategy, as it offers a reliable source of clean, baseload power that can keep facilities operating on a continuous basis.

Under your leadership, the NRC has undertaken critical steps to streamline the review of nuclear energy projects, including new licenses, license renewals, and siting practices. The NAM supports the common sense reforms the NRC has laid out which would provide greater efficiency and certainty to industry to keep existing plants online and build new nuclear generation capacity of all types, which will bolster power supply for manufacturers in the United States.

Streamlining the Construction of New Nuclear Reactors through Updated Definitions

Under the proposal, the NRC would narrow the definition of "construction" during the licensing process to cover only activities involving structures, systems, and components (SSCs) where construction could affect the material properties or the ability of the SSC to perform a safety-significant function. In other words, a project would only need to obtain a license for construction

activities that could directly affect or degrade a safety-significant function. Manufacturers support this proposed change, as it aligns broadly with other actions this administration is taking to more appropriately define “construction” in permitting processes.

The proposal also makes conforming changes across multiple sections to account for the new definition. This includes the overall environmental review process for reactors and the specific process that governs the licensing pathway for advanced and small module reactors.

These commonsense changes will significantly reduce project lead times, provide clarity for applicants that are pursuing innovative nuclear technologies, and lower costs for manufacturers that would otherwise be tied up in regulatory red tape that favors conservatism over innovation. At the same time, it also preserves safety as the NRC’s core statutory mission as it conducts the licensing process.

Regulatory Changes to Promote Innovation in Nuclear Fuel

Also included in the NRC’s proposal are changes to the regulations related to the use of conventional and accident tolerant Light Water Reactor fuel designs. According to the NRC, the purpose of these changes is to establish effective and efficient licensing of the use of fuels enriched to greater than 5.0 weight percent uranium-235 while continuing to provide reasonable assurance of adequate protection of public health and safety.

A key priority of the NAM is the strengthening of the United States’ nuclear fuel supply chain. Manufacturers in the United States are making great strides in producing innovative solutions that will power next generation nuclear reactors, including those that use uranium-235 fuels enriched above 5 percent. The NAM supports this change as it represents another action that will contribute to a resurgent U.S.-based nuclear fuel supply chain.

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The NAM supports the NRC’s proposed rule to modernize its licensing practices and regulatory framework. By focusing on a more efficient, risk-informed pathway for reactor deployment, the NRC is actively empowering the nuclear manufacturing sector to build, innovate, and deliver the abundant, reliable energy vital to America’s economic and national security. We look forward to continuing to work with the NRC to develop effective and sensible policies that will benefit manufacturers in the months and the years to come.

Sincerely,



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