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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 Reforming and Modernizing the NRC's Radiation Protection Framework (Docket NRC-2025-1140)

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, *Reforming and Modernizing the NRC's Radiation Protection Framework* ("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 energy demand growth accelerates, 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 central piece of that strategy, as it offers a reliable source of clean, baseload power.

Under your leadership, the NRC has undertaken critical steps to modernize and streamline the review of nuclear energy projects and licenses. The NAM supports the NRC's proposed rule, which aims to maintain robust, uncompromised protection for workers and the public while establishing a flexible, efficient, and objective regulatory framework.

In addition, to fully implement the direction reflected in Executive Order 14300, the NAM respectfully requests that the final rule more clearly adopt determinate radiation thresholds, limit subjective "as low as reasonably achievable" (ALARA) obligations where dose reductions are de minimis, and coordinate with the Environmental Protection Agency so that future radiation standards are consistent, predictable, and risk-informed.

Restoring Objectivity in Safety Standards to Strengthen Predictability and Speed the Deployment of Nuclear Energy

Under Executive Order 14300, which was issued in May 2025, the NRC was tasked with reconsidering the linear no-threshold (LNT) model for radiation exposure and the use of ALARA principle. It has been argued that reliance on the ALARA principle has resulted in a lack of objective endpoints, which naturally leads to subjective and variable interpretations of what is "reasonably achievable". This has added costs to nuclear projects without necessarily improving safety writ large.

The NAM supports the direction of the proposed rule but suggests that the Commission can further enhance this rulemaking by clearly replacing open-ended ALARA optimization expectations with determinate, science-based endpoints where exposures are very low. The concern is not merely administrative burden—it is that open-ended optimization can drive regulatory effort toward dose reductions that are not meaningfully distinguishable from natural background variability. At very low doses, risk estimates are inherently uncertain and are generally derived from conservative models rather than directly observable health effects. A modernized framework should therefore distinguish between prudent radiation protection and requirements that compel additional controls for de minimis dose reductions that do not materially improve public health.

Under this proposal, the NRC would specifically consider the adoption of determinate radiation limits through a graded approach to dose management. This approach would allow manufacturers to scale safety measures based on actual risk and would eliminate subjective enforcement ambiguity. It specifically raises the non-reactor air emissions dose constraint to 25 millirem (mrem) per year to reflect actual exposure risks after taking into account environmental dispersion.

While the NAM believes this is a positive step in the right direction, the proposed rule can be further improved by going beyond adjusting a single numerical constraint. The NAM suggests the NRC use this rulemaking to establish a broader principle that radiation protection requirements should be tied to determinate dose criteria, realistic exposure pathways, and proportionality relative to natural background and accepted public dose limits. In this respect, the LNT model may remain useful as a prudent screening tool for radiation protection planning, but it should not be treated as proof of observable risk at very low doses or as justification for indefinite ALARA-driven reductions below levels that are already protective.

The NAM believes that these changes would provide a streamlined regulatory regime that aligns with physical realities while still maintaining strong worker and public safety protections under the Clean Air Act. In particular, manufacturers such as advanced reactor companies and fuel cycle facilities would benefit from this change as it would pave the way for increased operations optimization and scaling of output. By having a clear picture of what the safety "rules of the road" are, manufacturers would have more predictability in their project timelines and decreased compliance costs while again ensuring communities and workers are fully protected.

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The NAM supports the NRC's efforts on this issue and would encourage the Commission to review the considerations that we have offered in this letter to strengthen this important proposal By modernizing radiation protection standards in this manner, the NRC can empower the nuclear

manufacturing sector to build, innovate, and deliver the abundant, reliable energy vital to America's economic and national security while preserving high standards of public and worker protection. 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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