National Association of State Energy Officials

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March 31, 2026

Thedore Garrish
Assistant Secretary for Nuclear Energy
Office of Nuclear Energy
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Subject: Nuclear Lifecycle Innovation Campus RFI Response

Dear Assistant Secretary Garrish,

The National Association of State Energy Officials (NASEO) represents the 56 State and Territory Energy Offices across the nation, and we appreciate the opportunity to provide input on the U.S. Department of Energy's (DOE) Request for Information (RFI) on the Establishment of Nuclear Lifecycle Innovation Campuses. NASEO, and, in particular, the 11 states comprising the NASEO Advanced Nuclear First Mover Initiative, offer the information and recommendations below in response to the RFI.

To support the work of states interested in nuclear power, NASEO created the Advanced Nuclear First Mover Initiative in partnership with the Idaho National Laboratory (INL) and DOE's Gateway for Accelerated Innovation in Nuclear. The initiative is led by state co-chairs, Indiana, Kentucky, New York, Tennessee, and Wyoming, and participating states Louisiana, Maryland, Pennsylvania, Utah, Virginia, and West Virginia. These states are committed to accelerating advanced nuclear deployment and are working with private sector and DOE to speed investment while ensuring the continued safety and reliability of nuclear power. Sixteen additional states participate in the initiative as Observer States: Arizona, Connecticut, Idaho, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nebraska, New Hampshire, New Jersey, North Dakota, South Carolina, Texas, Washington, and Wisconsin.

NASEO appreciates DOE's efforts to support states in addressing nuclear lifecycle considerations. Many of the states, including some of those in the NASEO First Mover Initiative, have significant interest in nuclear lifecycle management and will provide separate, state-specific responses to the DOE RFI. NASEO offers the following comments and recommendations:

- **Strengthen federal-state collaboration on nuclear waste management.** DOE has an opportunity to renew and strengthen the federal commitment to collaborative community engagement on nuclear waste management and disposal issues in partnership with interested State Energy Offices. Early and sustained engagement will help communities understand the potential benefits and responsibilities of hosting nuclear lifecycle campuses while building trust among federal agencies, state governments, and local stakeholders.

- **Provide federal financial support to reduce project risk.** Federal funding commitments and guidance would help reduce project risk, enable public-private partnerships, and support state-led actions that advance the nation's energy security goals through advanced nuclear deployment, including efforts to close the nuclear fuel cycle. Such support could include grant funding as well as loans through the DOE Office of Energy Dominance Financing.
- **Clarify regulatory guidance for multi-facility nuclear campuses.** To advance nuclear lifecycle innovation campuses, the Nuclear Regulatory Commission (NRC) must provide guidance on hazard analysis and siting considerations for multiple nuclear facilities located at a single site. Clear guidance will also be needed regarding emergency preparedness and measures to ensure the safe operation of facilities in close proximity. For example, a contiguous nuclear campus raises questions about whether reactor operations may be required to halt in the event of an air, water, or other operational issue at a nearby fuel reprocessing facility.
- **Reevaluate EPA and NRC regulatory requirements.** The U.S. Environmental Protection Agency (EPA) and the NRC should reevaluate and update regulatory requirements under 40 CFR Part 190 related to volatile radionuclide capture and immobilization for spent fuel reprocessing. This should also include evaluating international standards. Without such an evaluation and potential alignment, deployment of reprocessing technologies in the United States may remain noncompetitive with international counterparts.
- **Engage international partners to share best practices.** DOE should facilitate exchanges between State Energy Offices and international partners on lessons learned from operating nuclear fuel reprocessing facilities. These exchanges could better inform technology specifications, standards, and policy approaches that support greater harmonization in order to reduce costs and timelines associated with establishing nuclear lifecycle innovation campuses.
- **Clarify and update the national nuclear waste strategy.** In the absence of a comprehensive national strategy for a permanent repository, states face constraints in developing and implementing effective policies that will complement the federal approach. Congressional action is needed to modernize and clarify the national nuclear waste strategy, enabling stronger federal-state alignment on nuclear lifecycle management.

NASEO appreciates DOE's Nuclear Lifecycle Innovation Campuses RFI and the work of the Trump Administration to accelerate advanced nuclear power and ensure a robust U.S. nuclear supply chain. We strongly support a collaborative federal-state approach that is flexible and recognizes state energy policies and priorities. We look forward to working closely with DOE on speeding progress on advanced nuclear power investment and deployment.

Best regards,

David Terry
President, NASEO