September 21, 2026

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

Subject: Public Comment on Nuclear Regulatory Commission Draft Regulatory Guide DG-1443 Comprehensive Risk Metrics and Associated Risk Performance Objectives for Commercial Nuclear Plants (NRC-2026-3301)

Dear NRC Staff,

The Nuclear Innovation Alliance (NIA) is an independent, non-profit, non-partisan "think-and-do" tank whose mission is to help create the conditions for success for new nuclear energy so it can play a major role as an energy security and climate solution. Through policy analysis, research, outreach, and education, NIA is catalyzing the next era of nuclear energy. We focus on regulatory modernization, federal and state policy, and enabling private investment to support new reactor commercialization while meeting national environmental and energy security goals.

NIA supports the reasonable approach outlined in the DG-1443 Comprehensive Risk Metrics and Associated Risk Performance Objectives for Commercial Nuclear Plants and encourages NRC to continue to work with stakeholders as the guidance is implemented. The outlined approach is aligned with NIA's previous work. In particular, in our *Comprehensive Risk Metrics for Nuclear Reactor Regulation* report, NIA had recommended a flexible, predictable, self-consistent, and implementable process for applicants to put forward, and for NRC to approve, these risk metrics. Under DG-1443, NRC describes three different approaches that applicants could use. DG-1443 is also responsive to NIA's call for NRC to provide guidance regarding the implementation of the new comprehensive risk metrics.

NIA appreciates the Commission's leadership on this issue and the opportunity to provide input. If you have any questions, please contact Miranda McGuire at mmcguire@nuclearinnovationalliance.org.

Sincerely,

Judi Greenwald
President & CEO
Nuclear Innovation Alliance