



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 27, 2024

Mr. Frank Rusco, Director  
Natural Resources and Environment  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Mr. Rusco:


On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am providing the enclosed NRC Response to the U.S. Government Accountability Office (GAO) report, GAO-24-106326, "Nuclear Power Plants: NRC Should Take Actions to Fully Consider the Potential Effects of Climate Change," issued April 2, 2024. The NRC appreciates GAO's constructive and extensive engagement to understand the regulatory framework related to natural hazards and to ensure that the report is a fair and accurate characterization of NRC's regulatory structure, processes, and strengths. In the report, the GAO made three broad recommendations for executive action related to NRC's assessment of climate change. As noted in the NRC letter dated March 7, 2024, the recommendations are consistent with actions that are either underway or under development by the NRC staff.

However, considering the conservatisms, safety margins, and defense-in-depth policies described in the report, the NRC does not agree with the conclusion that the agency does not address the impacts of climate change. In effect, the layers of conservatism, safety margins, and defense in depth incorporated into the NRC's regulations and processes provide reasonable assurance of adequate protection of public health and safety, to promote the common defense and security, and to protect the environment. This consideration includes any plausible combination of natural hazards at a site for the licensed operational lifetime of the reactor, including changes in those hazards that could result from climate change. The GAO report states that the analysis performed within the report "does not account for site-specific plant elevation or protective measures plants may have taken to mitigate the risk of selected natural hazards." With site-specific analyses in mind, if there are changes to the conditions to which the reactors are licensed, the NRC has the authority to require safety related changes at each plant. The NRC continues to engage in continuous oversight of all nuclear reactors in the United States.

It is also important to note that the NRC's evaluations are based on nuclear safety; as such we cannot impose requirements that would increase energy resilience or require consideration of future climate impacts without a sufficient nuclear safety justification.

The NRC appreciates the opportunity to describe the agency's actions taken in response to the GAO's recommendations. If you have any questions or need additional information, please contact me or have your staff contact Mr. John R. Jolicoeur, Executive Technical Assistant, by phone at 301-415-1642 or by e-mail to [John.Jolicoeur@nrc.gov](mailto:John.Jolicoeur@nrc.gov).

Sincerely,

  
Christopher T. Hanson

Enclosure:  
As stated

**Identical letter sent to the following recipients, with the exception of the replacement of the point of contact with the Chair and the Director of the Office of Congressional Affairs:**

Mr. Frank Rusco, Director  
Natural Resources and Environment  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

The Honorable Shalanda Young  
Director, Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503  
cc: Christine A McDonald,  
Erin Alejandre

The Honorable Gary C. Peters  
Chairman, Committee on Homeland Security  
and Governmental Affairs  
United States Senate  
Washington, DC 20510  
cc: Senator Rand Paul

The Honorable James Comer  
Chairman, Committee on Oversight  
and Accountability  
United States House of Representatives  
Washington, DC 20515  
cc: Representative Jamie Raskin

The Honorable Thomas R. Carper  
Chairman, Committee on Environment  
and Public Works  
United States Senate  
Washington, DC 20510  
cc: Senator Shelley Moore Capito

The Honorable Edward J. Markey  
Chairman, Subcommittee on Clean Air, Climate,  
and Nuclear Safety  
Committee on Environment and Public Works  
United States Senate  
Washington, DC 20510  
cc: Senator Pete Ricketts

The Honorable Cathy McMorris Rodgers  
Chair, Committee on Energy and Commerce  
United States House of Representatives  
Washington, DC 20515  
cc: Representative Frank Pallone, Jr.

The Honorable Jeff Duncan  
Chairman, Subcommittee on Energy, Climate  
and Grid Security  
Committee on Energy and Commerce  
United States House of Representatives  
Washington, DC 20515  
cc: Representative Diana DeGette

The Honorable Buddy Carter  
Chairman, Subcommittee on Environment,  
Manufacturing and Critical Materials,  
Committee on Energy and Commerce  
United States House of Representatives  
Washington, DC 20515  
cc: Representative Paul Tonko

The Honorable Joe Manchin  
Chairman, Committee on Energy  
and Natural Resources  
United States Senate  
Washington, DC 20510  
cc: Senator John A. Barrasso