UNITED STATES COURT OF APPEALS FOR THE
DISTRICT OF COLUMBIA CIRCUIT

	)	
BEYOND NUCLEAR, INC. and	)	
the SIERRA CLUB, INC.	)	
	)	
Petitioners,	)	Case No. 24-1318
	)	
v.	)	
	)	
UNITED STATES NUCLEAR	)	
REGULATORY COMMISSION and the	)	
UNTIED STATES OF AMERICA,	)	
	)	
Respondents.	)	
	)	

STATEMENT OF ISSUES TO BE RAISED

Pursuant to this Court's order of October 7, 2024, Petitioners Beyond Nuclear, Inc. and the Sierra Club, Inc. hereby state that they intend to raise the following issues in this petition for review of the Nuclear Regulatory Commission's (the "NRC's" or "Commission's"): Final rule and guidance: Reviewing Nuclear Power Plant Operating Licenses – Environmental Review, 89 Fed. Reg. 64,166 (Aug. 6, 2024) ("the Rule"):

1. Whether the Rule violates the National Environmental Policy Act, 42 U.S.C. §§ 4331, et seq. ("NEPA") and the Administrative Procedure Act 5 U.S.C. § 706 ("APA"), by relying on and encoding, as binding regulations in all NRC license renewal and subsequent license renewal

proceedings for nuclear reactors, conclusions about the environmental impacts of renewing reactor licenses that are irrational, unreasonable, incomplete, unsupported, and arbitrary and capricious. This deficient environmental analysis is presented in Revision 2 to NUREG-1437, "Generic Environmental Impact Statement for License Renewal of Nuclear Plants" (August 2024) ("License Renewal GEIS").

2. Whether the Rule violates NEPA and the APA by relying on environmental impact data, analyses and findings in the License Renewal GEIS that fail to demonstrate consideration of the reasonably foreseeable effects of climate change -- including the increasing frequency and intensity of severe weather events -- on the likelihood and severity of nuclear reactor accidents during the term of renewed licenses.

Respectfully submitted,

/s/ Diane Curran
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