Congress of the United States
Washington, DC 20515

September 18, 2026

The Honorable Ho K. Nieh
Chairman
U.S. Nuclear Regulatory Commission
Mail Stop O-16 B33
Washington, DC 20555

Dear Chairman Nieh:

The Nuclear Regulatory Commission (the "NRC" or "Agency") is undertaking wholesale revision of its regulations, guidance, oversight processes, and organizational structure pursuant to Executive Order (E.O.) 14300, encompassing 47 regulations, 27 rulemakings, and 71 guidance documents. The NRC has also updated and "rebaselined" its Reactor Oversight Process and security programs, completed a reorganization, and is proceeding with broader efforts to reform the Agency's culture. We support efforts to ensure that the NRC's regulatory framework is efficient, risk-informed, and capable of supporting the safe and secure deployment of nuclear energy. However, the breadth of the changes currently underway raises significant questions about whether the NRC has adequately evaluated the cumulative effects of these reforms on nuclear safety, security, independent oversight, and public confidence.

On July 15, 2026, the NRC published a proposed rule revising its radiation protection framework (91 Fed. Reg. 43456). We are particularly concerned about the proposed revisions to the NRC's radiation protection framework. The NRC proposes to remove regulatory requirements implementing the "as low as reasonably achievable" (ALARA) principle and replace them with a determinate, graded approach to dose management based on defined thresholds. The proposal would also establish a new planned occupational dose limit extension permitting multi-year averaging of doses, revise monitoring and reporting requirements, and allow licensees in certain circumstances to request higher public dose limits for controlled areas and restricted situations.

The scale of this regulatory revision effort also warrants greater transparency regarding its costs, benefits, and resource implications. Given the scope of these changes, Congress needs to understand the analytical basis for the NRC's determination that the proposed reforms will improve efficiency without compromising safety, security, or regulatory effectiveness. In particular, the NRC should be able to identify the specific requirements being eliminated or modified, explain the basis for each change, and demonstrate how the revised framework will continue to provide adequate protection.

Accordingly, please provide the following information within 15 days of the date of this letter:

1. A complete list of all NRC regulations, guidance documents, oversight processes, security programs, and other regulatory requirements that have been or are expected to be modified, eliminated, consolidated, or otherwise affected as part of the NRC's implementation of E.O. 14300.
2. For each regulation, guidance document, or other requirement that has been materially modified or eliminated, the NRC's justification for the change, including the statutory, regulatory, technical, scientific, or operational basis relied upon.
3. A complete description of the process used to identify, develop, review, and approve the 27 E.O. 14300 rulemakings to date, including the roles of the NRC's leadership, program offices, and the Office of the General Counsel; the Advisory Committee on Reactor Safeguards; and other independent or advisory bodies.
4. For each of the rulemakings, the staff hours and full-time equivalents expended to date and projected through completion, by office, and the associated dollar cost by fiscal year.
5. For those costs, an identification of what portion is recovered as a service fee under 10 C.F.R. Part 170, what portion is recovered through annual fees under 10 C.F.R. Part 171, and what portion is excluded from fee recovery under 42 U.S.C. 2215, together with the resulting effect on annual fees assessed to materials and medical licensees.
6. All non-concurrences filed under the NRC's Non-Concurrence Process and all differing professional opinions submitted under the Differing Professional Opinions Program relating to any rulemaking, guidance revision, oversight process change, or reorganization undertaken pursuant to E.O. 14300 to date, together with the management responses to each; all letters from the Advisory Committee on Reactor Safeguards addressing those actions and the staff's responses; and, for each action the NRC has voted on, the vote sheets and any additional views of individual Commissioners.
7. For each completed or proposed rulemaking, the analyses conducted to determine whether the changes could affect nuclear safety, radiation protection, physical security, emergency preparedness, environmental protection, or the NRC's ability to conduct effective oversight.
8. A description of the criteria the NRC is using to determine that revised or eliminated requirements will provide protection equivalent to or greater than the requirements they replace.
9. With respect to the proposed radiation protection framework, a detailed explanation of the scientific and technical basis for replacing ALARA requirements with determinate dose thresholds, including the analyses used to evaluate the potential effects on workers and members of the public.

10. With respect to the proposed changes to occupational dose limits and monitoring requirements, an explanation of the basis for allowing multi-year averaging of occupational doses and establishing a reporting threshold tied to a five-year assessment.
11. A description of the NRC's engagement with radiation workers and the organizations representing them on the proposed changes to occupational dose limits and monitoring requirements, including the dates, participants, and subject of any such engagement; any analysis of the effects of the proposed planned occupational dose limit extension on the health of the affected workforce, including any evaluation of collective dose; and occupational exposure data for the past 10 years sufficient to establish a baseline against which the effects of the revised framework can be measured.
12. With respect to the proposed changes to public dose limits, identify the circumstances under which a licensee could receive authorization for a higher dose limit, the maximum limits contemplated, and the controls and review criteria that would apply to such requests.
13. All regulatory analyses, cost-benefit analyses, safety evaluations, scientific assessments, risk assessments, technical reports, legal analyses, decision memoranda, and other documents used to support the changes being undertaken pursuant to E.O. 14300.
14. A description of the NRC's process for identifying and monitoring unintended consequences resulting from the regulatory changes, including deterioration in safety performance, reduced regulatory visibility, increased radiation exposure, or other adverse outcomes.
15. The specific, outcome-oriented goals and performance measures the NRC will use to evaluate the implementation of E.O. 14300, including baseline data against which changes in safety performance, occupational exposure, public exposure, inspection findings, enforcement actions, licensing timelines, and other relevant outcomes will be measured.
16. A description of the circumstances or performance thresholds that would cause the NRC to reconsider, modify, or restore a requirement that has been eliminated or substantially revised pursuant to E.O. 14300.
17. An identification of any licensing review, inspection, or oversight activity that has been deferred, narrowed, or reprioritized to absorb this workload, by office and fiscal year, and the fiscal year 2026 appropriation and the fiscal year 2027 President's Budget Request amounts that supports implementation of E.O. 14300.

The NRC plays a unique and important role in protecting the American public from the risks associated with nuclear technology. We recognize the importance of maintaining a regulatory

framework that is efficient, predictable, risk-informed, and capable of supporting the continued operation of the existing nuclear fleet and the deployment of new nuclear technologies. The NRC's own materials identify these objectives as central to its implementation of E.O. 14300.

We therefore urge the NRC to proceed with appropriate caution and transparency as it implements these sweeping changes. Congress has a responsibility to understand how and why the Nation's nuclear safety regulator is changing its regulatory framework, and to ensure that those changes do not inadvertently weaken the protections that are required to maintain the safety of the U.S. nuclear fleet.

We look forward to your response within 15 days.

Sincerely,

Marcy Kaptur
Ranking Member, Subcommittee on Energy and Water Development
House Committee on Appropriations

Patty Murray
Ranking Member, Subcommittee on Energy and Water Development
Senate Committee on Appropriations