

Response to Questions for the Record from Hearing Entitled "DOE Modernization: Advancing the Economic and National Security Benefits of America's Nuclear Infrastructure" on February 6, 2018 before the U.S. House of Representatives Energy and Commerce Committee Subcommittee on Energy.

From:  
Dr. Ashley Finan, Nuclear Innovation Alliance

1. NNSA's testimony suggests that Part 810 processing times have fallen from 18 to 12 months. Do the findings in Nuclear Innovation Alliance's recent report on the Part 810 process align with that testimony? If so, is 12 months a reasonable time for processing these authorizations or could DOE process them more quickly?

NIA recently published an addendum to the "Part 810 Reform" report, and that addendum provides averages for Part 810 application processing times in recent years. For 2012, 2013, 2015, and 2016, the average processing times for specific authorization applications were 588, 477, 277, and 682 days, respectively. These averages are sorted by the year that the determinations were signed by the Secretary of Energy, though the sorting could be arranged by the year the application was received, which would shift the quoted yearly averages. Using NIA's formulation, however, the 18-month processing time that NNSA is referring to could potentially be the applications approved in either 2012 or 2016, although the average in 2016 is closer to 22 months. NIA does not have a data set for determinations signed in 2014, so it is possible that this is the year NNSA has in mind. Likewise, NIA does not have a full set of application processing data for 2017, so it is possible that the 12-month average that NNSA refers to is from that year. Otherwise, the average in 2015 could be what NNSA is referring to, although it is closer to 9 months.

NIA does not believe that 12 months is a reasonable amount of time for the U.S. government to spend, on average, for processing applications for specific authorizations. The NIA report, "Part 810 Reform," makes several recommendations which should improve the efficiency of Part 810. Some recommendations are directed towards DOE and NIA believes they would lead to faster processing of specific authorization applications. Other recommendations are directed at Congress and industry, and those would also be helpful.

2. Mr. McGinnis was asked about NIA's contention that the government is interested but not invested in nuclear energy programs. Would you clarify how the Department of Energy's Nuclear Energy program could better execute its mission and program direction?

NIA applauds the work being done by the DOE Office of Nuclear Energy, and the improvements that have been made over the past several years in GAIN and the advanced reactor concepts program. Further improvements are always possible, and NIA will work to research and develop suggestions. The contention that the government is not sufficiently invested applies much more broadly: The Office of Nuclear Energy cannot alone ensure U.S. leadership in nuclear energy. DOE leadership, the NNSA, the State Department, the Senate, the House of Representatives, and the White House all play critical roles, and U.S. nuclear energy leadership will require the concerted efforts of all of those groups. It is incumbent on each to understand the importance of the U.S. role in nuclear energy globally, to understand their responsibilities and opportunities to support that, and to take action. NIA will seek to support that work wherever possible.