

July 18, 2026

Chairman Ho K. Nieh and Fellow Commissioners
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Request for Extension of Public Comment Period – Proposed Rule, “Reforming and Modernizing the NRC’s Radiation Protection Framework”
Docket ID: NRC–2025–1140

Dear Chairman Nieh, and Commissioners Wright, Crowell, Marzano, and Weaver,

The Connecticut Department of Energy and Environmental Protection (DEEP) respectfully requests that the U.S. Nuclear Regulatory Commission (NRC) extend the public comment period for the proposed rule, “Reforming and Modernizing the NRC’s Radiation Protection Framework,”¹ from 45 days to 90 days to better enable the state to provide meaningful comment on this critically important proposal.

DEEP appreciates the NRC’s efforts to modernize its regulatory framework and recognizes the important role that nuclear technologies play in supporting clean energy, medical applications, scientific research, industrial uses, national security, and other beneficial uses of radioactive materials. At the same time, DEEP believes that proposed changes to the Nation’s foundational radiation protection standards—including long-established principles governing radiation dose limits, the As-Low-As-Reasonably-Achievable (ALARA) principle, and the underlying scientific and regulatory framework—warrant a deliberate, transparent, and inclusive review process that provides sufficient time for meaningful participation by Agreement States, Federal agencies, technical experts, licensees, professional organizations, industry, and the public.

This request should also be considered in the context of the NRC’s issuance of other major proposed rulemakings², that are currently subject to concurrent 45-day public comment periods. DEEP is particularly concerned that the current volume and pace of these concurrent NRC rulemakings—including this proposal and the nearly simultaneously issued proposed rule, “Modernizing Reactor Licensing, Safety Oversight, and Siting Practices” limits the ability of

¹ “Reforming and Modernizing the NRC’s Radiation Protection Framework,” (Docket NRC-2025-1140), 91 FR 43456 (July 15, 2026).

² “Modernizing Reactor Licensing, Safety Oversight, and Siting Practices,” (Docket 2025-2025-0975), 91 FR 44560 (July 16, 2026); “Implementation of the National Environmental Policy Act,” (Docket: NRC–2025–0478), 91 FR 42086 (July 7, 2026); “Modernizing Materials Licensing,” (Docket: NRC-2025-1370), 91 FR 38124 (June 24, 2026); and, “Integrated Low-Level Radioactive Waste Disposal,” (Dockets: NRC–2011–0012, NRC–2015–0003, and NRC–2017–0081), 91 FRN 40290 (July 1, 2026).

Agreement States and other stakeholders to adequately evaluate complex technical and policy changes. Together, these proposals would modernize two of the most fundamental components of the NRC's regulatory framework: (1) the radiation protection standards that underpin virtually every NRC program; and (2) the licensing and oversight framework governing current and future reactors. Reviewing both proposals concurrently requires extensive coordination among many of the same subject matter experts and organizations. Although distinct in scope, both rulemakings require many of the same technical experts, Agreement State program staff, legal counsel, policy specialists, licensees, and other stakeholders to conduct extensive, concurrent reviews. Evaluating these proposals in parallel significantly increases the demands on stakeholders and further supports providing additional time for meaningful participation.

This proposed rule alone spans numerous technical and regulatory disciplines, proposes significant changes to long-established radiation protection principles that have served as the foundation of the NRC's regulatory framework for decades, and requests stakeholder input on 14 separate questions. These questions are not requests for simple concurrence or general policy feedback. Rather, they require comprehensive technical evaluation of the scientific basis for the proposed changes, assessment of regulatory compatibility and implementation impacts, consideration of operational and enforcement consequences across multiple regulated industries, evaluation of potential unintended consequences, and development of well-supported recommendations on complex scientific, legal, and policy issues. The compressed comment period substantially limits stakeholders' ability to perform the rigorous analysis necessary to inform a rulemaking of this significance.

Unlike rulemakings focused on a single class of licensees or technology, this proposal would fundamentally revise the radiation protection framework that underpins virtually every NRC regulatory program. The proposed revisions to 10 CFR Part 20 and related regulations would affect the regulation of commercial nuclear power reactors, advanced reactors, fuel cycle facilities, radioactive waste management, medical uses of radioactive materials, industrial radiography, manufacturing and research, academic institutions, transportation, decommissioning, and numerous other licensed activities. Because these changes establish the baseline standards upon which many NRC regulations and guidance documents rely, their implications extend well beyond individual regulatory requirements and have the potential to influence future licensing decisions, inspection programs, enforcement practices, emergency preparedness, environmental reviews, and public confidence across the entire spectrum of civilian radioactive material uses.

As the 40th and most recent NRC Agreement State, Connecticut has direct regulatory responsibility for the safe use of radioactive materials within the State. DEEP is a partner with the NRC in the National Materials Program and is responsible for implementing compatible regulations, conducting licensing and inspections, and carrying out enforcement activities for more than 100 radioactive materials licensees. As such, DEEP has a substantial interest in ensuring that changes to the NRC's foundational radiation protection framework are technically sound, clearly articulated, compatible, and capable of being implemented consistently by Agreement States nationwide. Proposed revisions of this magnitude require Agreement States to evaluate not only the technical merits of the changes, but also their compatibility implications, impacts on existing State regulations and guidance, inspection and licensing programs, staff

training, implementation costs, and long-term regulatory consistency across the National Materials Program.

An extension of the public comment period would substantially improve the quality, completeness, and usefulness of stakeholder input, particularly from Agreement States that will ultimately be responsible for implementing compatible regulations and ensuring their consistent application. Additional time would facilitate more comprehensive technical review, broader engagement with affected stakeholders across the diverse spectrum of NRC-regulated activities, and more thoughtful consideration of the scientific, regulatory, and implementation issues presented by this proposal. Given that this rulemaking would revise the foundational radiation protection standards upon which much of the Nation's radioactive materials regulatory framework is based, an extension of the comment period is both reasonable and appropriate to ensure the NRC receives the robust technical input necessary to support a durable, well-founded, and broadly implementable regulatory framework.

For these reasons, DEEP respectfully requests that the NRC extend the public comment period for this proposed rulemaking from 45 to 90 days, with public comments due by October 12, 2026, to allow time for the development of meaningful comments.

Thank you for your consideration of this request for extension and for the opportunity to participate in this important rulemaking process.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Emma Cimino', is written over a horizontal line.

Emma Cimino
Acting Commissioner
Connecticut Department of Energy and Environmental Protection