

**Idaho National Laboratory Cleanup to Clean Energy Request for Information
Comment Response Document
U.S. Department of Energy, Office of Nuclear Energy**

The Department of Energy's Idaho Operations Office issued a request for information (RFI) as part of DOE's Cleanup to Clean Energy initiative. Five federal sites were selected to boost clean energy production by making DOE land available for potential carbon-free energy projects. 23 responses to the DOE-ID RFI were received in December. The responses from industry cover a diverse range of projects, including advanced nuclear, renewables and carbon removal. Questions received from the RFI are summarized below.

Q: Is DOE accepting projects besides clean energy technologies?

A: DOE received questions regarding the qualification of diverse technologies and non-power generation activities that support a broader clean energy technology sector. The Cleanup to Clean Energy initiative is focused on creating opportunities for generation of clean energy. Qualifying projects must produce energy for commercial use from any clean energy technology. The details of qualification will be listed in the final solicitation expected to be released early in 2024.

Q: Will you be able to extend the 10-year limit on PPAs?

A: The opportunity presented by the Cleanup to Clean Energy initiative is for land use only; no power purchase agreements (PPA) are being offered to developers as part of this initiative.

Q: What types of support can INL and DOE provide?

A: The opportunity presented by the Cleanup to Clean Energy initiative is for land use only. Existing Cooperative Research & Development Agreements (CRADA), Strategic Partnership Projects (SPP), Technology Alliance Partnerships (TAP), Gateway for Accelerated Innovation in Nuclear (GAIN) vouchers, and other collaborative opportunities exist, but those are negotiated separately.

Q: Can INL help provide water, electricity, paved roads, and other resources?

A: **Water:** The DOE water rights in use at INL are not available for commercial use. Commercial water rights, including permits for well drilling, would be the responsibility of developers and should be coordinated with the State of Idaho.

Electricity: Purchase of power for construction and operations, as well as transmission interconnection for power generation would be the responsibility of developers in cooperation with commercial utilities.

Paved Roads: Existing roads, paved and unpaved, may be made available to developers, based on DOE analysis of potential impacts to DOE operations. It is expected that improvements to any roads will be the responsibility of the developer.

Rights of Way: Allowance for new infrastructure would need to be established by the developer, working with BLM, with DOE approval, for roads, transmission, communications, etc.

Q: How, if at all, can INL help with the NRC licensing process for nuclear?

A: DOE will retain its oversight for the development of the project on DOE lands, but the Nuclear Regulatory Commission (NRC) has licensing jurisdiction over the construction and operation of commercial nuclear power projects. Completion of the NRC licensing process will be the responsibility of the developers. INL can provide access to information and data related to the Site to support the developer's application to the NRC, including information to support the National Environmental Policy Act (NEPA) review. Tribal engagement is encouraged to occur early and in coordination with DOE-ID.

Q: Transmission & Distribution – How will electricity get to and from industry projects?

A: Developers are expected to negotiate agreements with commercial utility providers directly. As per new FERC guidance we encourage developers to seek partnerships for interconnection.

Q: What does INL provide regarding site security?

A: INL provides overall security of the Site. Unless other arrangements are negotiated, commercial developers will be required to provide their own site security, in close coordination with existing INL site security.

Q: What will the NEPA process look like?

A: The National Environmental Policy Act (NEPA) is a procedural statute intended to ensure Federal agencies consider the environmental impacts of their actions in the decision-making process. It requires Federal agencies to consider the potential for major Federal actions to significantly affect the quality of the human environment. Differing levels of analysis may be required, based on the nature (i.e., potential impacts) of the proposed project. In most cases, DOE will be responsible for compliance with NEPA and INL provides substantial support to DOE throughout the process. If the proposed project is a commercial nuclear reactor, then both DOE and the NRC will be involved.

Furthermore, because federal lands will be impacted, the National Historic Preservation Act – dealing with cultural resources – will be triggered. This requires coordination with DOE and INL to ensure any actions associated with ground disturbing activities are reviewed in a timely manner. Typically, the NEPA process at INL engages multiple stakeholders, and in the case of external commercial development, some stakeholders will not have a vested interest in site characterization or construction.