



May 6, 2022

Mr. Steven Cornish
American National Standards Institute
Senior Director of International Policy and Strategy

Dear Mr. Cornish:

The American Nuclear Standards Institute (ANSI) encouraged its stakeholders to submit feedback on the International Workshop Agreement (IWA) on Net-Zero Guiding Principles. This letter provides such feedback on the behalf of the American Nuclear Society (ANS), the organization that represents 10,000 nuclear technology professionals in the United States and worldwide.

According to the British Standards Institution (BSI), the national standards body for the United Kingdom, a proposal was submitted to the International Organization for Standardization (ISO) Technical Management Board (TMB) to develop an International Working Agreement (IWA) with the intention to remove or reduce variation(s) on Net-Zero Guiding Principles in definition and approach. This IWA document would aim to:

- Define Net-Zero and related concepts
- Provide guidance on how the Net-Zero concept should be incorporated in initiatives, strategies, and policies
- Establish the basis for accountability mechanisms and measurements, such as development of consistent indicators enabling reporting and communication

ANS strongly believes that the IWA should be a mechanism for alignment, rather than a singular method for implementation, and should be established through an international collaborative relationship.

ANS highlights below two ANS position statements that relate directly to Net-Zero and related concepts.



- **ANS Position Statement 44, Nuclear Energy's Role in Climate Change Policy.**¹ Specifically, the position statement argues for a technology-neutral framework that values all clean energy generation in accordance with its carbon-reduction attributes. All technologies should be considered from the perspective of net impact on carbon generation, including system impacts such as emissions from backup generation sources, if required.
- **ANS Position Statement 43, Nuclear Technology's Critical Role in the World's Future Energy Supply.**² The position statement points out that all energy uses, not just electricity, must be considered in the transition toward energy technologies that generate less carbon dioxide and other greenhouse gases. Nuclear plants do not emit those substances, and the plants can work in coordination with intermittent clean energy sources such as solar and wind energy to ensure that energy is not just clean, but secure and reliable as well.

Furthermore, ANS offers below examples of standards that relate to climate change and its effects.

- **ANSI/ANS-2.21-2022: “Criteria for Assessing Atmospheric Effects on the Ultimate Heat Sink,”** (addresses climate change)
- **ANSI/ANS-2.3-2011 (R2021): “Estimating Tornado, Hurricane, and Extreme Straight Line Wind Characteristics at Nuclear Facility Sites”** (addresses extreme winds)
- **ANSI/ANS-2.8-2019: Determining Design Basis Flooding at Power Reactor Sites** (addresses floods, including tsunamis)

Finally, as the U.S. and other nations work to reduce emissions, they must adopt policies that consider the clean, reliable, and affordable attributes of nuclear energy. Policies to address climate change must be economical, practical, and effective. Studies show that steep greenhouse gas emission reduction cannot be achieved economically solely through intermittent renewables and energy storage. Reliable, available, clean energy sources like nuclear power must have a growing share of the global energy supply if climate goals are to be achieved.

¹ American Nuclear Society [Position Statement No. 44](#), Nuclear Energy's Role in Climate Change Policy, January 2022.

² American Nuclear Society [Position Statement No. 43](#), Nuclear Technology's Critical Role in the World's Future Energy Supply, August 2019.

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Please feel free to reach out to me if you have any questions.

Sincerely,

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Cc: Steven Arndt, Incoming ANS President
Craig Piercy, ANS CEO and Executive Director
Donald Eggett, Chair ANS Standards Board
Leah Parks, Chair ANS Public Policy Committee
Prasad Kadambi, ANSI Policy Advisory Committee
John Starkey, ANS Governmental Affairs