



February 11, 2026

RE: Written Testimony to the Oregon House Committee on Climate, Energy, and Environment in support of House Bill 4046 and the -2 amendments.

Chair Lively and Members of the Committee,

Generation Atomic submits this testimony to express strong support for House Bill 4046 and the -2 amendments.

We are a grassroots organization advocating for nuclear energy as part of climate solutions. Through work across multiple state-level feasibility study processes, we have observed what distinguishes credible, technically rigorous studies from those that fail to provide actionable information for legislative decision-making.

House Bill 4046, as amended, establishes a framework for rigorous, independent analysis of advanced nuclear reactor technology and its potential role in Oregon's energy future. The bill directs the Oregon Department of Energy to conduct a feasibility study examining the technical, economic, environmental, and regulatory considerations necessary to inform future legislative decisions about nuclear energy in the state.

Oregon's approach to policy has consistently emphasized evidence-based decision-making grounded in scientific consensus and technical analysis. This study reflects that commitment. The Intergovernmental Panel on Climate Change, synthesizing findings from thousands of peer-reviewed studies conducted by researchers worldwide, has examined pathways to limit global warming to 1.5 or 2 degrees Celsius. Every IPCC scenario that achieves these climate targets includes increased nuclear energy deployment alongside renewable energy expansion, energy efficiency improvements, and electrification of end uses.

The IPCC's modeling does not prescribe specific policy choices for Oregon - our state faces unique circumstances, including existing infrastructure, resource availability, workforce capabilities, and regulatory requirements that demand analysis tailored to our context. However, this global scientific assessment establishes nuclear energy as a recognized component of credible decarbonization strategies worldwide.

Oregon last comprehensively evaluated nuclear energy decades ago, in the context of significantly different technology, regulatory frameworks, and energy system requirements. A

feasibility study provides the legislature with current, technically rigorous information necessary to make informed policy decisions about Oregon's energy future based on present-day realities.

Public Hearing Considerations

Generation Atomic values constructive dialogue on energy policy, and we appreciate the opportunity to address several concerns raised during the February 10th public hearing. Before responding to these points, we want to acknowledge that nuclear energy raises legitimate questions about costs, safety, waste management, and economic viability that deserve rigorous examination. These concerns are exactly why a credible feasibility study matters.

Private Funding and Study Independence

Among the concerns raised during testimony, the most prominent was that private sector funding sources inherently compromise study integrity. Ensuring analytical independence is critical to producing credible results.

Study independence depends on who controls methodology, who selects the research team, and whether the analytical process operates free from funder influence. HB 4046's structure addresses these concerns through ODOE oversight of the study and research team selection. Conflict of interest evaluations add another layer of scrutiny to this process.

This structure functions effectively across many policy domains. Universities conduct research funded by industry associations while maintaining methodological independence through peer review and academic standards. Environmental consulting firms analyze questions for clients with strong interests in outcomes while following rigorous scientific protocols. What ensures credibility is not the absence of interested funders but rather the presence of independent researchers, rigorous methodology, transparent processes, and accountability structures.

Further, nuclear energy represents a high-risk, capital-intensive investment with uncertain returns. Investors or potential developers would not benefit from misleading feasibility analysis when facing billion-dollar infrastructure decisions. The legislation explicitly requires examination of regulatory barriers, economic viability, including full lifecycle costs, waste management challenges, technical feasibility, and potential environmental impacts. A study that simply promotes nuclear energy regardless of actual feasibility would be potentially costly to any entity that relied on its conclusions.

Studies from Michigan, Virginia, Maryland, and Pennsylvania were conducted by teams with nuclear industry connections - engineering firms that work on nuclear projects, universities with nuclear engineering programs, consultants with reactor technology expertise. Yet these studies maintained credibility because they operated under clear oversight structures, disclosed funding

sources and potential conflicts, used rigorous methodologies, and provided balanced analysis acknowledging challenges alongside opportunities.

The funding disclosure requirements in HB 4046 provide the transparency necessary for legislators and the public to evaluate study findings with full awareness of funding sources and potential conflicts of interest.

If concerns persist about potential funding influence, constructive alternatives are available. The legislature could appropriate full public funding for the study, eliminating questions about private sector influence. Alternatively, funding could be structured such that sources remain confidential to everyone except the legislature and mediating bodies handling funds until the study's completion and public release. Either approach addresses transparency concerns while ensuring adequate resources for thorough analysis.

Stakeholder Engagement and Study Independence

The relationship between stakeholder engagement and technical independence is an important consideration for feasibility study design. HB 4046 establishes an appropriate balance between these objectives.

The bill requires ODOE to "seek public input and provide opportunities for public comment during the development of the report." This ensures diverse perspectives inform the study while maintaining the independence necessary for credible technical analysis. There is an important distinction between stakeholder input - which enriches the study by highlighting community priorities and concerns - and stakeholder control over technical methodology and findings.

Technical feasibility studies succeed when qualified experts apply rigorous methodology to answer specific questions about costs, timelines, regulatory requirements, and technical performance. These questions require specialized analytical approaches rather than consensus-building among parties with different perspectives and interests.

Michigan's feasibility study was conducted through Michigan State University's Energy Policy Center with public input opportunities. Virginia worked through the University of Virginia with a similar structure. Maryland utilized the University of Maryland School of Public Policy. Pennsylvania established a Joint State Government Commission study process. These studies maintained credibility because they preserved the boundary between stakeholder engagement and technical independence - ensuring public perspectives informed the questions addressed while technical experts conducted the analysis.

Closely related to study independence is the question of what expertise is necessary to conduct meaningful technical analysis of nuclear technology.

A credible feasibility study requires diverse analytical capabilities - economists to examine market conditions and financial viability, policy analysts to evaluate regulatory pathways, environmental scientists to assess ecological considerations, and energy systems experts to analyze grid integration requirements. Each discipline contributes essential skills to different components of the analysis. Technical aspects of the study - reactor physics, licensing requirements, fuel cycle operations, and radiation safety - require specialized knowledge to analyze accurately. The objective is to ensure the study can competently address its full scope, not limiting perspectives to a single discipline.

Nuclear engineers, health physicists, reactor technology specialists, and fuel cycle experts develop this specialized expertise through years of education, research, and professional experience. They understand reactor physics, thermal hydraulics, materials behavior under radiation, reactor safety systems, radiation protection requirements, waste characteristics, fuel cycle operations, and the regulatory framework governing nuclear facilities.

Our review of nuclear feasibility studies across multiple states reveals a clear pattern. Studies conducted by teams incorporating those with demonstrated nuclear expertise consistently provide technically detailed, realistic, and useful analyses. The difference appears in detailed analysis of specific reactor technologies, realistic assessment of licensing timelines based on actual Nuclear Regulatory Commission requirements, proper treatment of supply chain considerations, accurate cost projections reflecting factors that drive nuclear project expenses, and competent discussion of safety systems and waste management approaches.

Without nuclear-specific expertise on the research team, Oregon risks investing resources in a study that cannot adequately answer detailed technical questions about licensing timelines, passive safety systems, supply chain requirements, workforce needs, spent fuel management protocols, and grid integration. These questions arise with any technology involving billion-dollar infrastructure investments.

Professional expertise qualifies individuals to understand technical complexities, evaluate evidence competently, and reach informed conclusions based on rigorous analysis - whether in epidemiology, structural engineering, climate science, or nuclear technology. ODOE oversight protects independence. The funding disclosure requirements in HB 4046 ensure transparency. Access to specialized expertise ensures the study can answer technical questions accurately.

Study-to-Development Concerns

Finally, some concerns suggested that authorizing this feasibility study represents an incremental step toward nuclear development in Oregon or creates momentum toward overturning Oregon's existing nuclear energy laws.

House Bill 4046 authorizes research and analysis. It does not authorize the construction of any facility. It does not modify Oregon's existing laws governing nuclear energy. It does not commit the state to any particular energy pathway. It does not grant permits or site approvals. It does not allocate funding for construction. It does not override any existing regulatory authority.

A feasibility study examines whether something could work, under what conditions, and at what cost. The legislature will receive this analysis and then decide - through entirely separate future legislative processes - whether and how to act on the information. Any actual change to Oregon's approach to nuclear energy would require new legislation debated and voted on through Oregon's full legislative process, subject to committee hearings with public testimony, floor debates, amendments, and votes.

This is evidence-based policymaking. Legislators gather information about options. Analysts evaluate feasibility, costs, benefits, and risks. Policymakers review this analysis alongside other considerations and then make decisions. Oregon's existing nuclear energy laws remain in full force and effect unless and until the legislature chooses to modify them through future legislation.

Conclusion

House Bill 4046, as amended, establishes a framework for examining advanced nuclear technology through independent technical analysis. The study will provide Oregon legislators with information about costs, feasibility, regulatory requirements, and economic considerations necessary to inform future energy policy decisions.

The quality of this analysis depends on the study's structure - rigorous methodology, appropriate expertise, transparent oversight, and public accountability. HB 4046 as amended provides this foundation.

We appreciate the committee's consideration and urge advancement of House Bill 4046.

Respectfully submitted,

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