

Chairwoman Allison Macfarlane
c/o Mary Woollen
U.S. Nuclear Regulatory Commission
Mail Stop O-16G4
Washington, DC 20555

26 September, 2013

Dear Chairwoman Macfarlane,

With the decommissioning efforts both planned and underway at various nuclear reactors around the country, there is an opportunity for the industry to demonstrate and establish a best practices standard for public and stakeholder engagement. As you know from our testimony and reports for the Blue Ribbon Commission, our work with the National Research Council, our publications in *Science* and in *The Bulletin of Atomic Scientists*, our numerous publications on consensus building, we believe that the science strongly supports the conclusion that it is beneficial for everyone involved— the public, stakeholders, private companies, and the government—when there is a sincere and competent effort to implement best practices for public and stakeholder engagement. It improves decision quality and legitimacy. This was the main finding of a 2008 National Academy of Science committee report entitled, *Public participation in environmental decision making*. And, as you have said repeatedly in your career, including your current tenure as Chairwoman of the Nuclear Regulatory Commission, it is critical to engage the public and all communities of interest.

Just weeks ago, Entergy Corporation announced it would decommission Vermont Yankee, starting in 2014. We care a great deal about how Entergy goes about working collaboratively and openly with the interested and affected parties during this process. For the past 20 years we have worked in a variety of policy contexts to promote the use of science to benefit the public interest, to improve public and stakeholder engagement, and to mediate conflicts. All of us have worked with communities and agencies cleaning-up radiologically contaminated sites. The Consensus Building Institute has worked on issues pertaining to Vermont Yankee. Our reports to the Blue Ribbon Commission recommended how to design public and stakeholder engagement processes that build trust, shared understandings, and operational agreements. While we wrote about the context of managing the spent nuclear fuel and high level wastes, the same is true for decommissioning of nuclear power plants.

Well-run public and stakeholder engagement can help ensure that concerns and needs of local communities are surfaced, considered, and to the greatest extent possible, addressed. An open and transparent process that is duly inclusive identifies the opinions, beliefs, concerns, and fears of the parties with a stake in the process. Surfacing these and taking care to address them builds trust in the company, builds trust in the industry, and helps to ensure the decommissioning process is predictable, safe, and responsive to local concerns. Well-run PSE is also good for private industry because it reduces the risk of encountering unexpected public outrage and opposition. We certainly agree in the necessity of tailoring methods to match the specifics of place, but there is also need to promote the use of the science of public and stakeholder engagement and risk communication. This is the approach of other agencies, such as the Food and Drug Administration (www.fda.gov/AboutFDA/ReportsManualsForms/Reports/ucm183673.htm).

As the nuclear industry undertakes the task of decommissioning nuclear power plants in Vermont, California, and elsewhere, they should make a strong effort to establish best practices for public and stakeholder engagement and risk communication. The Nuclear Regulatory Commission can and should play a leading role in bringing this science to the attention of those responsible for implementing decommissioning processes. The NRC already supports industry learning about a host of issues related to nuclear risk management. We recommend that the NRC:

- Identify lessons learned from past decommissioning processes.
- Develop guidance for best practices for public and stakeholder engagement and risk communication during cleanup and decommissioning of nuclear power plants based on the science and on lessons learned from experience.
- Prepare a Regulatory Issue Summary that conveys guidance on public and stakeholder engagement during decommissioning of nuclear power reactors.
- Encourage companies and state regulatory agencies to adopt and implement this guidance through whatever means of persuasion and incentives you can offer on this matter.
- Encourage those who act to learn and evaluate as they go, and to share those lessons with others through some kind of national network or forum over time.

We would very much enjoy the opportunity to meet with you to discuss these recommendations further when your schedule allows. We would also be delighted to support planning and facilitating a meeting among key stakeholders, perhaps convened by you, to explore this further. Thank you for your consideration.

Sincerely,

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Remsburg, Kristy

From: Seth Tuler [<mailto:sptuler@seri-us.org>]

Sent: Saturday, September 28, 2013 2:35 PM

To: Woollen, Mary

Cc: Thomas Webler; Pat Field; Catherine Morris

Subject: Letter regarding public and stakeholder engagement in decommissioning of nuclear power plants

Mary,

Attached is our letter to Chairwoman Macfarlane regarding public and stakeholder engagement in the decommissioning of nuclear power plants.

Regards,

Seth

Seth Tuler

Research Fellow

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