

NRC-2018-0052

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We, the undersigned local residents and organizations with local residents, hereby request that the Roswell, New Mexico public scoping meeting for the proposed Holtec nuclear waste facility be convened as a town hall hearing for the public's presentation of comments in a group meeting. We request that a representative of the NRC formally preside over the taking of comments; that the hearing be comprised of all who wish to be present both to comment and to listen to others' comments; and that the minutes of the overall proceedings be taken by a court reporter.

The three meetings announced by the NRC's Office of Public Affairs include an April 30 "open house and poster session" in Roswell and two "full scoping meetings," one on May 1 in Hobbs, the other on May 3 in Carlsbad. The Hobbs and Carlsbad meetings will be preceded by an "open house" for an hour, followed by a court reporter transcribing public comments made, as we understand it, in a town hall-style group setting.

We object to the planned commenting format in Roswell, where individual commenters will only meet one-on-one with a court reporter. NRC meetings are key opportunities for citizens to communicate with one another and will be used by the public to learn about the positions taken by people on all sides of the nuclear waste proposal. One-on-one comment sessions with a court reporter undermine the rights of the public to associate, are intimidating and may cause people to decline to comment. No one outside the locations where one-on-one statements are given will be able to hear others' comments. Members of the public will have to wait for comment transcripts to find out what others said, and those transcripts may not even be available during the comment period.

The NRC calls all three of these gatherings "public meetings," but the Roswell meeting is different. According to Webster's Third New International Dictionary Unabridged, the word "public" means "accessible to or shared by all members of the community."

The use of one-on-one encounters between commenters and court reporters is not covered by current NRC policy. In its 2016 "Commission Policy Statement on Staff Meetings Open to the Public," the NRC renamed scoping comment sessions "Comment-Gathering Meetings," and stated that their purpose "is for the NRC to obtain feedback on regulatory issues and NRC actions" in a meeting "held with a broad number of interested parties, including representatives of non-government organizations, private citizens, or various businesses or industries, to fully engage them in a discussion of a specific regulatory issue." The idea of tiny satellite comment sessions does not appear in the present policy.

According to its webpage, "The NRC considers public involvement in, and information about, our activities to be a cornerstone of strong, fair regulation of the nuclear industry. We recognize the public's interest in the proper regulation of nuclear activities and provide opportunities for citizens to be heard. We encourage participation and comments." The planned separation of commenters during the Roswell scoping meeting will contradict the NRC's supposed policy of inclusive public participation.

We request in the strongest terms that the Nuclear Regulatory Commission convene the Roswell scoping comment meeting as a public comment plenary session, with a formal presiding officers over a group meeting and formal transcription.

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We also point out that the location at the Eastern New Mexico University - Roswell campus is at the far south end of town. A much more central location would be the Roswell Museum and Art Center where many public meetings are held.

Thank you.

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