



## Social and Environmental Research Institute

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9 April 2020

Dear Ms. Reed and Mr. Lohr,

SERI has a long history of research and scholarship in the area of public and stakeholder engagement (PSE) in risk-related decision making. We are acutely aware of how poorly run PSE often leads to incompetent, unfair, and ineffective decisions that waste taxpayer money, delay problem solving, and contribute to the erosion of trust in governmental agencies.

While our Board is not prepared at this time to take a policy stance on the reprocessing of nuclear fuels, we are signing onto the letter by Barbara Warren (Citizens' Environmental Coalition) and Diane D'Arrigo (Nuclear Information and Resource Service) providing feedback to your March 4<sup>th</sup> presentation. We chose to do this to emphasize to the NRC how important it is to get the public participation right. Rulemaking about nuclear fuel reprocessing should not take place without first conducting an adequate public participation process.

The federal government has much experience and advice about how to do PSE competently and fairly. One of the best places to look for guidance is in National Research Council reports on this topic including the following:

[Understanding risk: Informing decision making in a democratic society.](#) (1996)

[Improving risk communication](#) (1989)

[Public Participation in Environmental Assessment and Decision Making](#) (2008)

In addition, we recommend the excellent book on [risk governance by Ortwin Renn.](#)

SERI has provided PSE guidance to DOE, EPA, and NOAA. There are numerous other resources available as well. We hope the NRC will make a commitment to adopting best practices when it comes to public and stakeholder engagement before changing rules that are likely to have significant effects.

Sincerely,

Thomas Webler (on behalf of the Board of Directors)  
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