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Notice to Conduct Scoping and Prepare an Advanced Nuclear Reactor Generic Environmental Impact Statement

Comment On: NRC-2020-0101-0002

Notice To Conduct Scoping and Prepare an Advanced Nuclear Reactor Generic Environmental Impact Statement

Document: NRC-2020-0101-DRAFT-0015

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General Comment

Dear Ms. Borges,

Thank you for contacting the San Manuel Band of Mission Indians (SMBMI), notifying us of the intent to conduct a scoping process and prepare a Generic Environmental Impact Statement for Advanced Nuclear Reactors (STC-20-036), and providing us an opportunity to comment. Nuclear power is a type of technology that is unparalleled in its potential to impact the environment. Any measure leading even indirectly to the proliferation of nuclear waste should be made mindful of those impacts.

In advance of the preparation of the initial draft GEIS, we have the following comments and recommendations at this stage:

SMBMI concurs with the NRC's limitation of the scope of the GEIS to Advanced Nuclear Reactors (ANRs) as defined in the Nuclear Energy Innovation and Modernization Act, not to include Light Water Reactors. SMBMI concurs with the NRC's assessment that environmental impacts to biological and environmental resources cannot be made generic. Furthermore, we recommend that the NRC does not delegate its authority to conduct non-generic environmental reviews to state or local agencies.

SMBMI recommends that environmental justice impacts cannot be made generic, as one cannot know the underserved parties effected by the undertaking until the site location is known.

SMBMI supports the NRC's proposal to limit the site size and thermal outputs of proposed projects in the Draft Plant Parameter Envelope (PPE), currently set at 100 acres and 30 MW(e), respectively. SMBMI recommends adding a line item in the PPE Assumptions that the Footprint of Disturbance will not occur on lands sacred to or subject to traditional use by federally-recognized Tribes. While NHPA review will occur as a Supplemental to the GEIS, adding this stipulation in the PPE Assumptions will encourage the Applicant to reach to tribes well ahead of time to determine the suitability of the Project Footprint in this regard.

We look forward to consulting on future drafts of the GEIS for ANRs.

Respectfully,
Alexandra McCleary, Tribal Archaeologist
San Manuel Band of Mission Indians