

**From:** [Mike Gates](#)  
**To:** [Drucker, David](#)  
**Subject:** [External\_Sender] OMB Advance Notification Comment  
**Date:** Monday, May 10, 2021 2:54:25 PM

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Attention Mr. Drucker, please note the comments as Emergency Management Director for the Seneca Nation. Sorry for the delay in my response.

Item 1: The NRC Advance Notification Program that has been instituted for Federally Recognized Tribes in the United States is important for several reasons.

- The protection of our tribal lands we occupy is of great importance. Assuring our tribal members and residents that shipments of radioactive materials have been thoroughly inspected by qualified safety teams established for the program has been met for transportation of all radioactive materials to the repositories.
- The training in the Safeguard Program has been a great addition to this Advance Notification program and gives our Seneca Nation POC and Alternate POC real-time information of the shipments in coordination with notice from the shippers from the start to finish at the destination. We used to get up early to watch the shipments go through our territory but many times missed them due to delays in the actual departure or delays during the transport. We can now watch from the comfort of our office or home computers and see and disparities that surface during shipment.
- Lastly these notifications serve great utility and the purpose of strengthening the Nation to Nation requirement the United States Federal Government has to treat the Seneca Nation as a Tribal Sovereign. These agreements were made by our forefathers to show the enduring respect that we both have to have with each other and the actions we take so as to not cause undo harm to one another.

Item 2: The Seneca Nation has shown other tribes our progressiveness by seeking out these programs and not waiting for the NRC, DOE, DOD, etc.. to come to us for the necessary training as they are needed to assure our people have the best information and participation possible to keep them safe and protection of our tribal land.

As Primary POC and the Alternate POC do not feel the burden has been too much to handle. The Seneca Nation administration over the years has been very confident we both have taken these safety roles very seriously. We have also mentioned to other tribes to seek these trainings from the agencies in charge to get ahead of the curve so to be better prepared.

Item 3: As I have mentioned the Seneca Nation has sought out the necessary information so I do not feel the way information is gathered needs much more enhancement. It should be the decision of one's own tribal officials to assess what is needed to ensure they are taking all the right precautions for their people. It is also a necessary function of tribes to keep NRC updated on any informational changes that occur within the tribe.

Item 4: The advent of modern technology has aided the collection and sharing of information and has been promulgated within the requisite policies with Tribal Nations. The needed steps now are to establish the same notification procedures the States receive with those that Tribal nations receive

as a course of respect and safety. Again this comes back to the Nation to Nation agreement established between the federal government and Recognized Tribes across the county.

Nya:weh for the opportunity to provide NRC with my opinion on these important matters.

Dëjihnyahta:´së´ ae´ (till our paths cross again)

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