

# PUBLIC SUBMISSION

<b>As of:</b> 7/27/21 3:51 PM
<b>Received:</b> July 21, 2021
<b>Status:</b> Pending_Post
<b>Tracking No.</b> kre-ct62-m1io
<b>Comments Due:</b> July 21, 2021
<b>Submission Type:</b> API

**Docket:** NRC-2018-0300  
Categorical Exclusions from Environmental Review

**Comment On:** NRC-2018-0300-0001  
Categorical Exclusions from Environmental Review

**Document:** NRC-2018-0300-DRAFT-0012  
Comment on FR Doc # 2021-09675

---

## Submitter Information

**Email:** chudyca@gmail.com  
**Organization:** Oregon Conservancy Foundation

---

## General Comment

Re: Docket ID NRC-2018-0300.

The Nuclear Regulatory Commission's (NRC) "plan to amend NRC regulations on categorical exclusions for licensing, regulatory, and administrative actions that individually or cumulatively do not have a significant effect on the human environment" is fundamentally flawed from the beginning. The stated purpose is to "modernize it's environmental review process" by not only updating but also "expanding the field of categorical exclusions in its regulations implementing the National Environmental Policy Act of 1969 (NEPA)" combined with doing away with public involvement.

The explanation for doing this involves a "commitment to modernize." Alleged benefits of doing so include "streamlining" the environmental review process for NRC licenses, "expediting" projects having to do with nuclear power plant decommissioning and spent fuel and radioactive waste management, and realizing "efficiencies" by creating new categorical exclusions. We recognize the language of deception whose outcome ignores the health and safety of citizens. Fast tracking the nuclear power industry in every aspect of it's operations does not serve the public interest.

What the NRC should have, in it's obligation to implement NEPA regulations, is an unwavering commitment to the safety and health of the American people, along with active public participation in the process. Instead, the NRC has become an arm of the nuclear industry while sidelining public involvement.

Allowing the NRC to proceed with this Rulemaking on "Categorical Exclusions" to determine what does or does not have "a significant effect on the human environment" relative to the nuclear power industry is putting the fox squarely in charge of the henhouse, and we citizens pay the ultimate price.

Our Oregon Conservancy Foundation has worked for decades to protect the Pacific Northwest's "human environment" from the unnecessary risks to their health and safety from nuclear power. We call on the NRC to do it's job by following NEPA mandates without shortcuts or "categorical exclusions."

Respectfully,

Cathryn Chudy

Lloyd Marbet

Oregon Conservancy Foundation