

From: Nuclear Issues Study Group <protectnewmexico@gmail.com>
Sent: Saturday, October 30, 2021 12:00 AM
To: NRC-EJReview Resource
Subject: [External_Sender] Docket ID NRC-2021-0137
Attachments: NISG Letter to NRC re EJ.pdf

On behalf of the Nuclear Issues Study Group (NISG), attached is our comment submission for Docket ID NRC-2021-0137.

Thank you,
Leona Morgan, NISG Coordinator

Federal Register Notice: 86FR36307
Comment Number: 99

Mail Envelope Properties (CABLah05ptL_PYW_PDJuf0nUc1X7M36YPWjKf7tmQg=sjdYJ4oA)

Subject: [External_Sender] Docket ID NRC-2021-0137
Sent Date: 10/29/2021 11:59:56 PM
Received Date: 10/30/2021 12:00:19 AM
From: Nuclear Issues Study Group

Created By: protectnewmexico@gmail.com

Recipients:
"NRC-EJReview Resource" <NRC-EJReview.Resource@nrc.gov>
Tracking Status: None

Post Office: mail.gmail.com

Files	Size	Date & Time
MESSAGE	168	10/30/2021 12:00:19 AM
NISG Letter to NRC re EJ.pdf		453022

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:



Nuclear Issues Study Group
202 Harvard Dr SE, Albuquerque, NM 87106
protectnewmexico@gmail.com +1 505 879 8547

October 29, 2021

Office of Administration, Mail Stop: TWFN-7-A60M
ATTN: Program Management, Announcements and Editing Staff
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Sent via electronic mail to: NRC-EJReview@nrc.gov from protectnewmexico@gmail.com

Re: Docket ID NRC-2021-0137

To Nuclear Regulatory Commission (NRC):

This letter is submitted on behalf of the Nuclear Issues Study Group (NISG) in response to NRC's request for input regarding its policies and protocols regarding Environmental Justice (EJ). NISG will continue to submit comments on the matter, however this letter specifically focuses on the process, staff, and contractors NRC uses to conduct its public meetings.

On September 27, 2021, the Nuclear Regulatory Commission held a "listening session" about Environmental Justice, and Leona Morgan (Co-founder and Coordinator of NISG) was an invited guest speaker. Leona, who goes by the pronouns "she" and "her," had delivered her prepared speech and later was asked a question by NRC contracted facilitator Frances "Chip" Cameron. During her given time, Leona was informing the facilitator how offensive and racist his comment was he had made about "Discovery," when he was erroneously referring to Leona's previous input about a document called, the "Doctrine of Discovery."

As Leona was explaining how the NRC is structured within a framework of institutionalized racism and operates within this system of oppression toward people of color, which perpetuates white supremacy, the organizers cut off her microphone her right when she is accusing the NRC of "systemic genocide" and "racism."

She had also highlighted how the NRC has failed to have respectful communication with Indigenous tribes across the board. As an Indigenous woman with 15 years of experience dealing with the NRC, this is not the first instance of disrespect and erasure experienced by Leona, by others members of NISG, and by the community at large.

This abusive treatment at a meeting intended to solicit input from the community on how to better engage with the NRC is just the latest in a long pattern of disrespectful and racist behavior by the agency whose motto is "protecting people and the environment."

Chip Cameron has repeatedly created a hostile environment at many NRC meetings by mispronouncing names, assuming genders and sexual orientation, as well as cutting off speakers without warning, among promoting a general demeanor of homo/trans-phobic, white-supremist, hetero-male, patriarchy. Chip and any other staff or contractors who represent the NRC should be well trained in anti-oppressive language, behavior, and of course facilitation. Any repeated offenders must be reprimanded, fired, or in the case of contractors: cease to be hired again.

Furthermore, NRC needs to extend its policy of EJ beyond its legal obligations of the National Environmental Policy Act (NEPA) and use the EJ Principles (attached) when considering all levels

of decision-making, from license applications and environmental reviews to the selection of the Commission and all actions of the Atomic Safety and Licensing Board.

The Nuclear Issues Study Group, our allies, and supporters demand the following:

1. We demand the NRC cease hiring Frances “Chip” Cameron to facilitate public meetings, *effective immediately*.
2. We demand that the NRC hire a facilitator trained in anti-racism and anti-oppression.
3. We demand the NRC listen to communities of color, which cannot be a box to check off. We demand that NRC officials actually listen to communities who take the time to share their stories of how they’ve been impacted by this deadly nuclear industry.
4. We demand the NRC cease to rubber stamp every single nuclear industry project submitted.
5. We demand the NRC instead of “Polluting People and the Environment,” that they live up to its motto: “Protecting People and the Environment”.
6. We demand the NRC cease to appoint the same condescending white cis-het male facilitator for every public meeting.
7. We demand that the NRC address the environmental and health impacts of nuclear projects rather than minimizing and erasing them.
8. We demand that NRC restructure as a neutral and unbiased organization rather than stay in the pocket of the nuclear industry.
9. We demand that the NRC provide full and complete translations of each public meeting organized by the NRC in Navajo and Spanish (the languages of impacted communities).
10. We demand that the NRC post audio of all public meetings online.
11. We demand that NRC postpone public comment sessions until it is safe to meet in person during the global COVID-19 pandemic.
12. We demand that NRC offer more accessible and adequate technical setup for online public meetings than is currently used by the NRC.

If there are any questions regarding what has been stated in this letter, please do not hesitate to email them to protectnewmexico@gmail.com.

Thank you for receiving our comments,

Leona Morgan, NISG Coordinator

Nuclear Issues Study Group

WE, THE PEOPLE OF COLOR, gathered together at this multinational People of Color Environmental Leadership Summit, to begin to build a national and international movement of all peoples of color to fight the destruction and taking of our lands and communities, do hereby re-establish our spiritual interdependence to the sacredness of our Mother Earth; to respect and celebrate each of our cultures, languages and beliefs about the natural world and our roles in healing ourselves; to ensure environmental justice; to promote economic alternatives which would contribute to the development of environmentally safe livelihoods; and, to secure our political, economic and cultural liberation that has been denied for over 500 years of colonization and oppression, resulting in the poisoning of our communities and land and the genocide of our peoples, do affirm and adopt these Principles of Environmental Justice:

The Principles of Environmental Justice (EJ)

- 1) **Environmental Justice** affirms the sacredness of Mother Earth, ecological unity and the interdependence of all species, and the right to be free from ecological destruction.
- 2) **Environmental Justice** demands that public policy be based on mutual respect and justice for all peoples, free from any form of discrimination or bias.
- 3) **Environmental Justice** mandates the right to ethical, balanced and responsible uses of land and renewable resources in the interest of a sustainable planet for humans and other living things.
- 4) **Environmental Justice** calls for universal protection from nuclear testing, extraction, production and disposal of toxic/hazardous wastes and poisons and nuclear testing that threaten the fundamental right to clean air, land, water, and food.
- 5) **Environmental Justice** affirms the fundamental right to political, economic, cultural and environmental self-determination of all peoples.
- 6) **Environmental Justice** demands the cessation of the production of all toxins, hazardous wastes, and radioactive materials, and that all past and current producers be held strictly accountable to the people for detoxification and the containment at the point of production.
- 7) **Environmental Justice** demands the right to participate as equal partners at every level of decision-making, including needs assessment, planning, implementation, enforcement and evaluation.
- 8) **Environmental Justice** affirms the right of all workers to a safe and healthy work environment without being forced to choose between an unsafe livelihood and unemployment. It also affirms the right of those who work at home to be free from environmental hazards.
- 9) **Environmental Justice** protects the right of victims of environmental injustice to receive full compensation and reparations for damages as well as quality health care.
- 10) **Environmental Justice** considers governmental acts of environmental injustice a violation of international law, the Universal Declaration On Human Rights, and the United Nations Convention on Genocide.
- 11) **Environmental Justice** must recognize a special legal and natural relationship of Native Peoples to the U.S. government through treaties, agreements, compacts, and covenants affirming sovereignty and self-determination.
- 12) **Environmental Justice** affirms the need for urban and rural ecological policies to clean up and rebuild our cities and rural areas in balance with nature, honoring the cultural integrity of all our communities, and provided fair access for all to the full range of resources.
- 13) **Environmental Justice** calls for the strict enforcement of principles of informed consent, and a halt to the testing of experimental reproductive and medical procedures and vaccinations on people of color.
- 14) **Environmental Justice** opposes the destructive operations of multi-national corporations.
- 15) **Environmental Justice** opposes military occupation, repression and exploitation of lands, peoples and cultures, and other life forms.
- 16) **Environmental Justice** calls for the education of present and future generations which emphasizes social and environmental issues, based on our experience and an appreciation of our diverse cultural perspectives.
- 17) **Environmental Justice** requires that we, as individuals, make personal and consumer choices to consume as little of Mother Earth's resources and to produce as little waste as possible; and make the conscious decision to challenge and reprioritize our lifestyles to ensure the health of the natural world for present and future generations.

More info on environmental justice and environmental racism can be found online at www.ejnet.org/ej/

Delegates to the First National People of Color Environmental Leadership Summit held on October 24-27, 1991, in Washington DC, drafted and adopted these 17 principles of Environmental Justice. Since then, the Principles have served as a defining document for the growing grassroots movement for environmental justice.