

**As of:** November 01, 2021  
**Received:** October 26, 2021  
**Status:** Pending\_Post  
**Tracking No.** kv8-svgb-g944  
**Comments Due:** October 29, 2021  
**Submission Type:** API

# PUBLIC SUBMISSION

**Docket:** NRC-2021-0137

Systematic Assessment for how the NRC Addresses Environmental Justice in its Programs, Policies, and Activities

**Comment On:** NRC-2021-0137-0001

Systematic Assessment for How the NRC Addresses Environmental Justice in Its Programs, Policies, and Activities

**Document:** NRC-2021-0137-DRAFT-0579

Comment on FR Doc # 2021-14673

---

## Submitter Information

**Name:** Joel Weisberg

**Email:** jweisber@carleton.edu

---

## General Comment

This is written in response to your request that we consider the NRC's record on environmental justice.

For most of the existence of the NRC and its predecessor agencies, environmental justice was low on its priority list for all activities in the nuclear energy chain. For one example, uranium mining and milling was concentrated on Indian reservations, which led to serious health problems for workers involved in these processes. As another example, numerous reactors are sited on or near Indian reservations. A primary example is the nearby Prairie Island plant, located on the Prairie Island Reservation. The plant hosts a reactor and used, highly radioactive fuel rods, some in pools and others dry cask radioactive waste storage.

Even at present, the NRC is still derelict in its policies toward cleanup. For example, there are more than 15,000 abandoned uranium mines on reservations and little remediation of the enormous Church Rock dam breach on the Navajo land.

I applaud the NRC for making an effort to include environmental justice in its policies going forward. However I am not aware of any concrete steps taken yet. A good start would be for the NRC to acknowledge its and its predecessor agencies' historical lack of taking environmental justice into account, and, to the contrary, siting facilities where emissions and workers tended to be from BIPOC communities. The NRC should also demonstrate its commitment to environmental justice by committing to remediate abandoned uranium mines and the Rio Puerco River downstream for the Church Rock spill. In addition, the agency should put real resources into its EJ activities, thereby demonstrating that the efforts are serious.

Only after acknowledging past wrongs and today doing what is possible to remediate them and to seriously involve environmental justice perspectives today, will the affected communities take seriously any new environmental justice initiatives by the NRC.

