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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

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## Submitter Information

**Name:** Johanna Kovitz

**Email:** joko@pangolyn.com

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## General Comment

No one wants a nuclear facility or waste site in his or her back yard. In fact, the White House Committee on Environmental Justice lists "procurement of nuclear power" under the heading "Projects that will not benefit a community." Historically, the people most affected by nuclear facilities and waste sites have been low-income people, often communities of color. The NRC needs to acknowledge its past failures regarding environmental justice, and put in place strict new procedures to protect vulnerable communities in the future.

NRC's 10CFR2 rules for intervention currently are clearly skewed in favor of nuclear proposals. They should be amended to empower environmental justice communities to participate with standing (presume intervenor status), and to accept their contentions. Also there should be more diversity in NRC-ASLB judges. Environmental justice consideration should include the full revelation of cumulative and synergistic impacts from multiple sources of pollution and health stressors. All information should be made available in the primary languages of the communities, and public comment periods should be lengthened to enable more meaningful participation.

Nuclear transport is also critical. NRC should study the environmental justice impacts of many decades of nuclear waste transport along rails, roads, waterways—largely through disadvantaged communities—from reactors to waste sites. The containers hold more plutonium than the Nagasaki bomb and more cesium than Chernobyl releases. They routinely emit radiation even without accidents. There will be accidents, and front-line communities will bear the burden. At the very least, these communities need to give their prior and fully informed consent.

The NRC should regulate aggressively to protect the health of all Americans, and not merely act as an enabler for the nuclear industry at the expense of the most vulnerable among us.