

# PUBLIC SUBMISSION

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Mary Neely  
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**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

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## Submitter Information

**Name:** Christopher Bergan

**Address:**

DECORAH, IA, 52101

**Email:** ccharlesic@msn.com

**Phone:** 563.380.7258

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## General Comment

Addressing Environmental Justice

Comment on NRC-2021-0137-0001

29 October 2021

One pdf file attached. Thank you for the opportunity to comment on this important and interesting topic.

Respectfully,

Christopher Bergan, Decorah IA

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## Attachments

NRC comment EJ

Addressing Environmental Justice  
Comment on NRC-2021-0137-0001  
29 October 2021

The first informational request in this docket is to express what Environmental Justice [EJ] entails. My answer is that EJ should be primarily forward facing – acknowledging past errors (intentional or accidental) and move to create a best possible future for current & future generations. This would include not only our fellow human beings but also the environment. Unfortunately I cannot say “natural environment”, as most of the Earth has already been compromised.<sup>[1]</sup> Instead, the best we can do is manage what we have created from “Mother Earth” and restore much of the planet to near natural conditions – until such time as natural processes can be reestablished apart from human meddling. I’ll just add that any intentional past errors should be rectified with reparations, while accidental errors should be compensated and publicly acknowledged as much as possible.

I was able to join the October 21 NRC-EJ meeting by phone (listener only mode) and was impressed by many of the public speakers & NRC moderators. One item which was mentioned was the 17 Principles of Environmental Justice<sup>[2]</sup> – which are somewhat problematic for me. I greatly admire the general spirit of the document, but items #4 and #6 seem to group all nuclear technologies (weapons, power, medical, etc) into the same group. Weapons are certainly a troubling concern and should be converted to fuels for power productions instead (Megatons to Megawatts). But all peaceful civilian applications of nuclear technologies should be embraced, in my opinion. In fact Principle #17 states that the human race should “consume as little of Mother Earth's resources and to produce as little waste as possible”. To me this clearly implies & supports nuclear, though the original signers of the Principles of EJ may have been (and possibly still are) ignorant of this reality. Principle #11 to recognize and respect Native Peoples should also be a priority. Principle #16 “calls for the education of present and future generations which emphasizes social and environmental issues”. To me this would best be addressed by having visitor centers at most or possibly all nuclear energy centers. There is a saying that a lie can travel halfway around the world while the truth is still putting on its shoes<sup>[3]</sup> If the truth about nuclear already has it's shoes on (so to speak), then any lies or misinformation will be tripped up and soon become a thing of the past. In my opinion, future NRC public meetings could certainly have a different tone if there were well attended nuclear visitor centers informing the public with facts. The NRC might also consult with the Nuclear Energy Institute on it's interpretation of the EJ Principles.<sup>[4]</sup>

In lieu of adhering closely to the Principles of EJ, I would encourage the NRC to more closely use the UN SDGs<sup>[5]</sup> as a guide for future public engagement.

The second area of comment requested was the NRC might engage and gather public input. I would suggest public liaison groups composed of regional volunteers: persons from interested NGOs, tribal groups, universities, or members of the public. The NRC is currently divided into 4 regions. This should be a great starting place but because Region 4 is so large, I'd like to suggest that it be divided with 4a being MS through AZ and then CA towards KS with states to the north, AL, & HI included. So that there would be 5 regional EJ groups which would meet quarterly to advise the NRC on EJ issues and fact finding efforts. This should also be a two way communication, with the NRC reciprocating. The proceedings of meetings should be reported to public outlets (news media and bloggers), possibly with non-EJ liaisons invited to observe. In fact, these meeting could be held at the visitor centers I mentioned previously (HINT!).

The final portion of my comment is say, plan ahead to assist in environmental disasters – don't just react to EJ issues of the past! The NRC is excellent at risk assessment, and a little preventative

planning is certainly better than after-the-fact assessments.<sup>[8]</sup> SMRs should be considered as part of a rapid response to disasters which interrupt energy supplies. FEMA disaster relief could be augmented with a few SMRs (operated by trained Army or National Guard members) which could be operational on site within ~20 hours of a declared disaster. These could be mounted on trucks, barges, or ships. Assisting other US government agencies should be among the many goals of the NRC, and rapidly responding to quickly unfolding environmental disasters (whether natural, climate change induced, or industrial) would be a great way to show the efficacy of cooperation between well organized government agencies.<sup>[6] [7]</sup>

Thank you for the opportunity to comment on this important and interesting topic.

Respectfully,

Christopher Bergan, Decorah IA

===== NOTES =====

- 1) ...the researchers analyzed the populations of about a dozen large mammals that play important roles on their home turf. When changes to their populations were factored into the analysis, the results showed that just 2.8 percent of land ecosystems remain intact. [www.smithsonianmag.com/smart-news/humans-have-altered-97-percent-earths-land-through-habitat-and-species-loss-180977542/](http://www.smithsonianmag.com/smart-news/humans-have-altered-97-percent-earths-land-through-habitat-and-species-loss-180977542/)
- 2) [www.ejnet.org/ej/principles.html](http://www.ejnet.org/ej/principles.html)
- 3) Falsely attributed to Mark Twain, likely it was first said by Jonathan Swift.
- 4) [www.nei.org/resources/environmental-justice-principles](http://www.nei.org/resources/environmental-justice-principles)
- 5) [www.iaea.org/about/overview/sustainable-development-goals](http://www.iaea.org/about/overview/sustainable-development-goals)
- 6) The Defense Science Board has a 99 page report which proposes that the US military fund the development of very small nuclear reactors for forward remote operating bases. The Task Force reviewed several nuclear reactor concepts that differ in size and technology from conventional commercial reactors and the small modular reactor (SMR) concepts currently under development for commercial use. Some of these reactors, very small modular reactors (vSMRs) with an output less than 10 MWe (megawatts-electric), may be transportable and deployable in FOB, ROB, and expeditionary force situations, and could eliminate the need for logistics fuel otherwise dedicated to producing electrical power. [www.nextbigfuture.com/2017/07/very-small-modular-nuclear-fission-reactors-for-military-and-space-applications.html](http://www.nextbigfuture.com/2017/07/very-small-modular-nuclear-fission-reactors-for-military-and-space-applications.html)
- 7) As a reflection of DOD's interest in this technology, the 2019 National Defense Authorization Act (NDAA) that Congress passed in August directed the secretary of energy to report to Congress within a year on the requirements and components needed for a pilot program to "site, construct and operate at least one licensed micro-reactor that provides resilience for national security infrastructure at a DOD or DOE facility." [www.nei.org/news/2018/micro-reactors-power-remote-military-bases](http://www.nei.org/news/2018/micro-reactors-power-remote-military-bases)
- 8) First and foremost, injuries to people should be the first consideration of the risk assessment. Hazard scenarios that could cause significant injuries should be highlighted to ensure that appropriate emergency plans are in place. Many other physical assets may be at risk. These include buildings, information technology, utility systems, machinery, raw materials and finished goods. The potential for environmental impact should also be considered. Consider the impact an incident could have on your relationships with customers, the surrounding community and other stakeholders. Consider situations

that would cause customers to lose confidence in your organization and its products or services.  
[www.ready.gov/risk-assessment](http://www.ready.gov/risk-assessment)