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

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

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General Comment

MY FIRST QUESTION FOR YOU: Who do you all think you are, when every one of you know that nuclear energy is devastating, harmful and is NOT the correct path to follow for ANY REASON WHATSOEVER!!!!!!!!!!!!!!!!!!!!!! I am so ashamed of this country, the corporations and the hubris of sad, and very uninformed folks who just want more money and control over EVERYTHING!!!!!!!!!!!!!! I am convinced now that the need for money and power corrupts completely the supposed "human" beings who are running the planet. I am 70 years old now, and have been protesting the nuclear energy industry for 55 years, since I was in junior high school. I have talked to learned nuclear scientists, some of whom are in the Union of Concerned Scientists, who also support the abolition of this tech. It is NOT safe for anything at all, and our planet is having a hard time getting rid of the toxicity of the horrible actions taken by our misguided and corrupt governments. Our planet is strong, will survive, but WE WILL NOT!! I urge you to read the rest of this protest, which I am sending, and this is not in my own words, but it says it all for me!!! WAKE UP!!!!!!!!!!!!!!!!!!!!!!

The NRC cannot operate in an environmentally just way without acknowledging its past violations of Environmental Justice (EJ) all along the nuclear chain. Most nuclear reactors, uranium mining-milling-"enrichment" facilities, fuel factories, reprocessing, and both high and "low-level" waste sites and transport routes are targeted for or located in/upstream/upwind of low income, rural or inner-city, communities of color. (HMMM...WHY DOES THIS NOT SURPRISE ME? RACIST CLASSIST ACTIONS TAKEN BY FRIGHTENED LITTLE BOYS AND GIRLS! Really? How terribly sad for you!)

A next step is to compensate, cleanup, and repair damage done by previous NRC and AEC licensee actions, including over 15,000 abandoned uranium mines and the 1979 Church Rock disaster directly impacting indigenous people. The White House EJ Advisory Committee's list of "PROJECTS THAT WILL NOT BENEFIT A COMMUNITY" includes "procurement of nuclear power." (Why are we still targeting the real caretakers of this land, the indigenous tribes who actually know how to take care of our beautiful Mother Earth?!...WHY are we still so STUPID!???)

To prevent repeating the past, NRC should set up structures to assist EJ communities including
(1) a permanent EJ Advisory Board to assess all NRC processes, with authority to prevent EJ violations and
(2) an independent division of NRC, with a firewall from existing staff, to assist intervenors (similar to current staff support for applicants).

The costs could be part of license application/amendment fees. Fees should also cover costs of
(3) intervenor funding for legal and technical expertise. Canada has intervenor funding.

NRC's 10CFR2 rules for intervention are clearly skewed in favor of nuclear proposals—they must be amended to enable EJ communities to participate, get standing (presume intervenor status), and for their contentions to be accepted. Local Hispanic intervenors and their contentions were dismissed in the Holtec CIS licensing case. Diversity in NRC-ASLB judges might help.

NRC could improve its EJ policy by going beyond the National Environmental Policy Act requirements. Under NEPA, EJ should be automatically considered in Generic EISs and Environmental Assessments.

EJ “consideration” should include the full revelation of cumulative and synergistic impacts from multiple sources of pollution and health stressors.

Make all information available in the primary languages of the communities and provide longer public comment periods to enable more meaningful participation.

Until the COVID-19 crisis with variants passes, extra measures are needed to enable already-over stressed and disproportionately impacted EJ communities to engage.

Finally but importantly, NRC must seek to determine EJ impacts of many decades of nuclear waste transport along rails, roads, waterways largely through EJ communities from reactors to waste sites. The containers hold more plutonium than the Nagasaki bomb and more cesium than Chernobyl releases and routinely emit radiation even without accidents!!!!!!!!!!!!!!!!!!!!!! Are you really getting this?! WAKE UP!!! You folks will be dealing with this as well, as long as you and your children live on this Earth. ARE YOU ALL REALLY THAT STUPID!? There will be accidents and front-line communities will bear the deadly burden without free, prior, informed consent or knowledge. DO THE RIGHT THING!

A Reverend in CA