April 8, 2020

Kristine Svinicki, Chair
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Chairman@nrc.gov

Commissioner Jeff Baran
Cmrbaran@nrc.gov

Commissioner Annie Caputo
Cmrcaputo@nrc.gov

Commissioner David A. Wright
Cmrwright@nrc.gov

SUBJECT: Request for Suspension of All NRC Rulemakings and Other Activities Involving Public Comment or Participation Until 6 Months After End of COVID-19 Crisis

Dear Commissioners:

We write to you amid the COVID-19 emergency, which threatens the physical health of all members of the public, the financial health of our businesses, the social fabric of our communities, and the viability of our government institutions, including the U.S. Nuclear Regulatory Commission (NRC).

We are concerned that no measures are being taken for protection of the critical role played by interested members of the public in the NRC’s rulemakings and licensing decisions. As you know, the provision of an opportunity to participate in NRC’s rulemaking and licensing decisions is mandated by three separate statutes: the Atomic Energy Act, the Administrative Procedure Act, and the National Environmental Policy Act.

In the current COVID-19 crisis, there is no possibility of effective public participation in the NRC’s regulatory decision-making process. Many members of the public are currently living in self-enforced, strongly-recommended or mandated isolation, unable to leave their homes for work or travel. Public agencies and institutions are closed or short-staffed and focusing on the most immediate priorities raised by the pandemic. As the disease spreads, it may have a serious impact on the ability of some members of the public to function at all. Under these conditions, it is extremely difficult, if not impossible, to conduct legal and factual research and prepare detailed comments on the often highly complex proposals made by the NRC and license applicants in rulemakings and interpretations, certifications, licensing including amendments and adjudications.

In a March 20, 2020 phone call and subsequent calls between the NRC Staff and representatives of the Nuclear Energy Institute (NEI) and nuclear reactors licensees, NRC discussed the need to prioritize the most critical NRC actions, in recognition that COVID-19 may severely impact NRC and licensee personnel but discussion of the impact on public participation has been out of scope. We strongly urge you to fulfill your responsibility to the public and stakeholders by addressing the priorities of all rulemakings, licensing, license amendments, proposed interpretive rules, certifications, adjudications and any other activities involving public input. Activities that are crucial to protecting from the current COVID-19 crisis should be prioritized. We call for all actions requiring and/or benefiting from public
participation and input be set aside or suspended until after the crisis has ended so that the public can meaningfully participate.

To proceed in a business-as-usual manner with long-term rulemakings, interpretive rules, licensing and other proceedings that are not on the critical path of responding to the COVID-19 crisis would be a misallocation of resources, a violation of law and extremely unfair to the public.

**We ask that all proceedings involving public participation be postponed until the COVID-19 crisis has formally been declared to have ended and has practically ended plus a minimum of 6 months for comment periods, in-person public meetings and other procedural and adjudicatory steps, once it is safe to carry them out. This will allow organizations, government entities, individuals and other stakeholders sufficient time to ramp up their operations after the period of suspension.**

The undersigned individuals and organizations have a long history of participating in NRC rulemakings and licensing proceedings, to the benefit of public health and safety and the environment. We call on you now to protect the role that we and other affected members of the public play in your decision-making processes. Finally, we submit to you that the measures we request are essential to ensure your continued compliance with the Atomic Energy Act, the Administrative Procedure Act, and NEPA.

Sincerely,

Diane D’Arrigo  
Nuclear Information and Resource Service  
Takoma Park, MD

Diane Curran  
Harmon, Curran, Spielberg + Eisenberg LLP  
Washington, DC

Geoff Fettus  
Natural Resources Defense Council  
Washington, DC

Jeff Carter  
Physicians for Social Responsibility  
Washington, DC

Tyson Slocum  
Public Citizen, Inc.  
Washington, DC

Kevin Kamps  
Beyond Nuclear  
Takoma Park, MD

Lukas Ross  
Friends of the Earth  
Washington, DC

Ian Zabarte  
Native Community Action Council  
Las Vegas, NV

Terry Lodge  
Toledo Coalition for Safe Energy  
Toledo, OH

Glenn Carroll  
Nuclear Watch South  
Atlanta, GA

David Kraft  
Nuclear Energy Information Service -NEIS  
Chicago, IL

Holly Harris  
Snake River Alliance  
Boise, ID

Louis Zeller  
Blue Ridge Environmental Defense League  
Glendale Springs, NC

Scott Williams, MD  
Healthy Environment Alliance of Utah  
Salt Lake City, UT
Leona Morgan  
Nuclear Issues Study Group  
Albuquerque, NM  

Jessie Collins  
Citizens' Resistance at Fermi 2  
Redford, MI  

Peggy Maze Johnson  
Heart of America NW  
Seattle, WA  

Deb Katz  
Citizen Awareness Network  
Shelburne Falls, MA  

Amber Reimondo  
Grand Canyon Trust  
Flagstaff, AZ  

Diane Turco  
Cape Downwinders  
Harwich, MA  

Mary Lampert  
Pilgrim Watch  
Duxbury, MA  

Priscilla Star  
Coalition Against Nukes  
Sag Harbor, NY  

Tina Cordova  
Tularosa Basin Downwinders Consortium  
Albuquerque, NM  

Adrian Shelley  
Public Citizen's Texas office  
Austin, TX  

Jenn Galler  
Blue Ridge Environmental Defense League  
Knoxville, TN  

Judy Treichel  
Nevada Nuclear Waste Task Force  
Las Vegas, NV  

Eric Epstein  
Three Mile Island Alert, Inc.  
Harrisburg, PA  

Joanne Steele  
Nuclear Watch South  
Sautee-Nacoochee, Georgia  

Susan Hito-Shapiro  
LEAF, Inc. (Legal Environmental Advocacy Fund)  
Nanuet, New York  

Bill Smirnow  
Nuclear Free New York  
Greenlawn, NY  

Marilyn Elie  
Indian Point Safe Energy Coalition  
Cortlandt Manor, NY  

Debra Stoleroff  
Vermont Yankee Decommissioning Alliance  
Montpelier, Vermont  

Janet Greenwald  
Citizens for Alternatives to Radioactive Dumping  
Dixon, New Mexico  

Gail Payne  
Radiation Truth  
Centerport, NY  

Molly Johnson  
San Luis Obispo Mothers for Peace  
San Luis Obispo, CA  

Julie Boddy  
City of Takoma Park Nuclear Free Committee  
Takoma Park, MD  

Mary Beth Brangan  
Ecological Options Network  
Bolinas, CA  

Gwen DuBois, MD  
Chesapeake Physicians for Social Responsibility  
Maryland
<table>
<thead>
<tr>
<th>Name</th>
<th>Organization/Role</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>John Philo</td>
<td>Sugar Law Center for Economic and Social Justice</td>
<td>Detroit, MI</td>
</tr>
<tr>
<td>Sal Mangiagli</td>
<td>Citizens Awareness Network</td>
<td>Moodus, CT</td>
</tr>
<tr>
<td>Sally Jane Gellert</td>
<td>Occupy Bergen County</td>
<td>Bergen County, NJ</td>
</tr>
<tr>
<td>Bennet Zurofsky</td>
<td>Bennet D. Zurofsky, Attorney at Law</td>
<td>Maplewood, NJ</td>
</tr>
<tr>
<td>Lewis Patrie</td>
<td>Western NC Physicians for Social Responsibility</td>
<td>Asheville, NC</td>
</tr>
<tr>
<td>Ellen Thomas</td>
<td>Proposition One Campaign for a Nuclear-Free Future</td>
<td>Tryon, NC</td>
</tr>
<tr>
<td>Libbe HaLevy</td>
<td>Nuclear Hotseat Podcast/Broadcast</td>
<td>Los Angeles, CA</td>
</tr>
<tr>
<td>Sheila Parks</td>
<td>On Behalf Of Planet Earth</td>
<td>Watertown, MA</td>
</tr>
<tr>
<td>Dorah Shuey</td>
<td>Shuey Research</td>
<td>Davenport, CA</td>
</tr>
<tr>
<td>Henrietta Cosentino</td>
<td>Pilgrims for Safe Decommissioning</td>
<td>Plymouth, MA</td>
</tr>
<tr>
<td>Faye More</td>
<td>Port Hope Community Health Concerns Committee</td>
<td>Cobourg, Ontario</td>
</tr>
<tr>
<td>Charley Bowman</td>
<td>Environmental Justice Task Force of the WNY Peace Center</td>
<td>Buffalo, NY</td>
</tr>
<tr>
<td>Bart Ziegler, PhD</td>
<td>Samuel Lawrence Foundation</td>
<td>Solana Beach, CA</td>
</tr>
<tr>
<td>Susan Gordon</td>
<td>Multicultural Alliance for a Safe Environment</td>
<td>Albuquerque, NM</td>
</tr>
<tr>
<td>Lea Foushee, George Crocker</td>
<td>North American Water Office</td>
<td>Lake Elmo, MN</td>
</tr>
<tr>
<td>Michael Keegan</td>
<td>Coalition for a Nuclear Free Great Lakes</td>
<td>Monroe, MI</td>
</tr>
<tr>
<td>Bradley Angel</td>
<td>Greenaction for Health and Environmental Justice</td>
<td>San Francisco, CA</td>
</tr>
<tr>
<td>Ann Suellentrop</td>
<td>Physicians for Social Responsibility - Kansas City</td>
<td>Kansas City, KS</td>
</tr>
<tr>
<td>Maggie Gundersen</td>
<td>Fairewinds Energy Education</td>
<td>Charleston, SC</td>
</tr>
<tr>
<td>Jay Coghlan, Scott Kovac</td>
<td>Nuclear Watch New Mexico</td>
<td>Santa Fe, NM</td>
</tr>
<tr>
<td>Sarah Stock</td>
<td>Living Rivers &amp; Colorado Riverkeeper</td>
<td>Moab, UT</td>
</tr>
<tr>
<td>Michel Lee</td>
<td>Council on Intelligent Energy &amp; Conservation Policy</td>
<td>Scarsdale, NY</td>
</tr>
<tr>
<td>Name</td>
<td>Organization</td>
<td>City</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>-------------------------------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Denise Duffield</td>
<td>Physicians for Social Responsibility - Los Angeles</td>
<td>Los Angeles, CA</td>
</tr>
<tr>
<td>Robert Gould</td>
<td>Physicians for Social Responsibility, San Francisco Bay Area Chapter</td>
<td>San Francisco, CA</td>
</tr>
<tr>
<td>Diane Turco</td>
<td>Cape Downwinders</td>
<td>Harwich, MA</td>
</tr>
<tr>
<td>Kelly Lundeen</td>
<td>Nukewatch</td>
<td>Luck, WI</td>
</tr>
<tr>
<td>Mary Lampert</td>
<td>Pilgrim Watch</td>
<td>Duxbury, MA</td>
</tr>
<tr>
<td>Amber Reimondo</td>
<td>Grand Canyon Trust</td>
<td>Flagstaff, AZ</td>
</tr>
<tr>
<td>David Hughes</td>
<td>Citizen Power, Inc</td>
<td>Pittsburgh, PA</td>
</tr>
<tr>
<td>Jeff Hoey</td>
<td>New Jersey Peace Action</td>
<td>Bloomfield, NJ</td>
</tr>
<tr>
<td>Sarah Fields</td>
<td>Uranium Watch</td>
<td>Monticello, UT</td>
</tr>
<tr>
<td>Ron Unger</td>
<td>Veterans for Peace, Chapter 106</td>
<td>Dallas, TX</td>
</tr>
<tr>
<td>Vina Colley</td>
<td>National Nuclear Workers for Justice</td>
<td>Portsmouth, Ohio</td>
</tr>
<tr>
<td>Jennifer Nielsen</td>
<td>SOMA Action</td>
<td>Maplewood, NJ</td>
</tr>
<tr>
<td>Susan Michetti</td>
<td>Mt. Horeb Citizens Against Water Fluoridation</td>
<td>Mt Horeb, WI</td>
</tr>
<tr>
<td>Barbara Warren, RN, MS</td>
<td>Citizens' Environmental Coalition</td>
<td>Cuddebackville, NY</td>
</tr>
<tr>
<td>Tyler Bradley</td>
<td>Cold Mountain Child</td>
<td>South Haven, MI</td>
</tr>
<tr>
<td>Patricia Golden</td>
<td>Clark Hotel Historical Museum</td>
<td>Van Horn, TX</td>
</tr>
<tr>
<td>Karen Hadden</td>
<td>SEED Coalition</td>
<td>Austin, TX</td>
</tr>
<tr>
<td>Lon Burnam</td>
<td>Dallas Peace and Justice Center</td>
<td>Dallas, TX</td>
</tr>
<tr>
<td>Lynda Schneekloth</td>
<td>Western New York Environmental Alliance</td>
<td>Buffalo, NY</td>
</tr>
<tr>
<td>Alice Hirt</td>
<td>Don't Waste Michigan</td>
<td>Holland, MI</td>
</tr>
<tr>
<td>John Coequyt</td>
<td>Sierra Club</td>
<td>Washington, DC</td>
</tr>
<tr>
<td>Daniel Hirsch</td>
<td>Committee to Bridge the Gap</td>
<td>Ben Lomond, CA</td>
</tr>
</tbody>
</table>