

August 31, 2001

MEMORANDUM TO: Melvyn N. Leach  
Fuel Cycle Licensing Branch  
Fuel Cycle Safety and Safeguards

FROM: Thomas H. Essig, Chief /RA/ /CA for THE/  
Environmental and Performance Assessment Branch  
Division of Waste Management

SUBJECT: COMMENTS ON IRIGARAY/CHRISTENSEN RANCH DRAFT EA

The Environmental and Low-Level Waste Section has completed its review of the draft environmental assessment (EA) for the surface decommissioning plan that was submitted by COGEMA for the Irigaray and Christensen Ranch In-Situ Leach Projects. Based on the review, we have several comments related to the content of the EA (see attached). If substantive revisions are made to the EA as a result of these comments or comments received from the State of Wyoming, then we would like to review the EA again at a later date.

If you have questions regarding this review or the attached comments, please contact Anna Bradford, of my staff. She can be reached at 415-5228.

Attachment: Comments on the Draft Environmental Assessment

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Attachment: Comments on the Draft Environmental Assessment

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**Comments on the Draft Environmental Assessment for Surface Decommissioning Plan,  
Source Material License No. SUA-1341, COGEMA Mining Co., Irigaray and Christensen  
Ranch Projects, Mills, Wyoming**

1. In accordance with Part 51.30, the EA should contain a section that describes the purpose and need for the proposed action.
2. Section 1.0. It would be helpful if the first paragraph or two of the introduction described the In-Situ Leaching (ISL) facility.
3. Section 1.1. It is stated that buildings and equipment will be decontaminated, if possible. However, it is not clear whether the decontaminated buildings and equipment will be removed or remain in place.
4. Section 2.0. This section should include brief descriptions of the site's climate, geology, groundwater resources, and nearby populations.
5. Section 2.1, Tables 1.1 and 1.2. The information presented about land ownership is unclear. Does the NRC license cover the entire 21,000 acres of the Irigaray property and the 14,000 acres of the Christensen Ranch property? Does COGEMA rent the land from the surface owners?
6. Section 2.3. The last sentence of this section states that ground water "will not" be impacted and therefore, is not addressed. Section 4.2 states that the activities "should not" impact groundwater. These two statements do not seem to completely agree with each other.
7. Section 2.5. This section apparently describes waste management actions in the past (during ISL operations) and in the future (during decommissioning activities). It is suggested that this information be divided into subsections. Also, estimates should be given of waste volumes and types that will be produced during implementation of the proposed action.
8. Section 3.1. Item number 3 on the list of planned activities says that items to remain on site will be decontaminated for unrestricted use. It should be specified which structures will remain on site. Also, this list does not specifically address the evaporation and storage ponds (described in Section 2.5) present at the site. What actions will be taken for the ponds?
9. Section 3.3. This section should provide an estimate of approximately how much acreage will be disturbed during decommissioning activities.
10. Section 4.0. This section should also evaluate the impacts on noise, socioeconomics, and natural resources.

11. Section 4.1. The first paragraph of this section should give an explanation of why the air quality impacts should be minimal. Will truck traffic be more or less than the current level of traffic, or levels during ISL operations? Also, it would be helpful if the relevant air quality standards for particulate matter were given here for comparison. In addition, the EA presents values from modeling performed in 1978. Are there more recent monitoring data that could be used instead?

In addition, the second paragraph states that “Radioactive particulates created by cleaning the surface of equipment and buildings, by demolition, or by soil excavation, will be monitored and controlled within the required limits.” How will the particulates be monitored and controlled? What are the required limits? Will the discharges be significantly less than the limits? This information may be incorporated by reference.

12. Section 4.4, Threatened or Endangered Species. The first sentence states that information from the U.S. Fish and Wildlife Service (FWS) dated August 3, 2001, indicated concerns about threatened and endangered species. It would be helpful if the draft EA listed the species of concern named by the FWS. Also, the third sentence of the paragraph then discusses “the nest” without explaining what nest or species is being referred to. In addition, it is unclear how the small population of prairie dogs is related to the possible presence of the endangered black-footed ferret.
13. Section 4.5. The first paragraph has a sentence that mentions the environmental impact of an accident involving a truck containing contaminated material. Is this scenario evaluated further in a separate document? Also, this paragraph refers to “tables provided below” that show traffic estimates. However, the tables have not been included in the draft EA.
14. Section 4.6. It is suggested that a statement be added that explains that the staff looked for other activities, but did not find any. For example, “NRC has found no other activities in the area that could result in cumulative impacts.”
15. Section 5.0. The environmental impacts of alternatives to the proposed action should be described. Or, a statement should be added that the No Action alternative (i.e., deny the license amendment request) would not be acceptable because contamination exceeds allowable limits.
16. Section 6.0. A discussion of financial surety is not required to be in EA.
17. Section 7.0. It is suggested that this section be titled “Summary and Conclusions” rather than “Finding of No Significant Impact” (FONSI). The FONSI should be a separate document from the EA itself. See 10 CFR 51.32 and 51.35.

In addition, the second bullet states that “radiological releases...will be very small (exposures which are small fractions of radiological exposure standards will result)...” There are no estimates of exposures presented in the EA to support this conclusion.

Radiological exposures should be evaluated by the EA as part of the assessment of the effect on human health; if the applicable estimates are presented in another document, then a reference should be given to that document.

18. Section 8.0, Consultations. The first sentence states that the NRC staff “will or has held discussions...” These discussions and consultations should be completed before the EA is in its final revision. Also, it is suggested that the first sentence start with “In preparing this EA...” rather than “In completing this licensing action...”

**Routing Slip**  
**Environmental and Performance Assessment Branch/DWM/NMSS**

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 Memorandum To: Melvyn Leach  
 From: Thomas Essig  
 Subject: COMMENTS ON IRIGARAY/CHRISTENSEN RANCH DRAFT EA

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