

From: "Coila Ash" <coilaash@mindspring.com>
To: <LES_EIS@nrc.gov>
Date: 3/18/04 2:12PM
Subject: Comments on Docket Number 70-3103

2/4/04
69FR5374
114

Dear Ms. Wong,

Please find attached Creative Commotion's comments regarding Docket Number 70-3103/the LES gas centrifuge uranium enrichment facility.

Thank you for your consideration of our concerns and requests.

Sincerely,
Coila Ash, Director

Creative Commotion: Voices for Social Change
325 E. Coronado Road #2
Santa Fe, New Mexico 87505
505-982-2609 ~ coilaash@mindspring.com

RECEIVED
2011 MAR 19 PM 1:10
Rules and Directives
Branch
USNRC

F-RFDS=ADM-03
ADM=T. Johnson (TC5)
M. Wong (MCW)

Template=ADM-013

Creative Commotion

Voices for Social Change

325 E. Coronado Road #2
Santa Fe, New Mexico 87505

505-982-2609
coilaash@mindspring.com

March 18, 2004

Via email to: LES_EIS@nrc.gov

Rules and Directives Branch
U.S. Nuclear Regulatory Commission
Mail stop T6-D59
Washington, DC 20555-0001
Attn: Melanie Wong

Regarding: Docket Number 70-3103

Dear Ms. Wong,

In response to Federal Register of February 4, 2004 (Volume 69, Number 23) regarding a gas centrifuge uranium enrichment facility proposed to be built near Eunice, New Mexico by Louisiana Energy Services (LES), I request that the Nuclear Regulatory Commission include the following five items within the scope of the Environmental Impact Statement (EIS).

First, I request that the Commission require a thorough examination into the potential impact of air emissions from this facility on the health and safety of New Mexico and Texas residents. I refer the Commission to a recent article in the *Uk Observer* ("Plutonium from Sellafield in all Children's Teeth," November 30, 2003) which details scientific findings showing that proximity to the Sellafield nuclear fuel facility was a significant indicator of the amount of radioactive plutonium found in children's teeth. British Nuclear Fuels Ltd, the operator of the Sellafield facility, is one of the partners of the proposed facility in Eunice, which raises concern about the reliability of the operator's projections.

Second, I request that the EIS include a thorough evaluation of the potential impact to quality of the ground and surface water in southeastern New Mexico and west Texas. I am especially concerned about potential impacts to the Ogallala aquifer over which this facility is proposed to be built. Given the fact there is no facility currently licensed to accept LES's waste, and that no such facility is currently on the drawing boards, the likelihood is that the waste will be stored indefinitely on or near the proposed site. The experience of similar facilities in Kentucky and Ohio have shown that storage of this

type of material can and does leak and can cause damage to human health and the environment.

Third, I request that a thorough examination of water quantity issues for southeastern New Mexico and west Texas be included in the EIS. I am concerned about the availability of water needed to supply this plant while still meeting current and future demands in the Hobbs and Eunice area. Further, if any surface or groundwater contamination from the operation or waste storage associated with this facility occurs our precious water supply could be additionally compromised if not destroyed. Precaution must be used when considering the siting of any industry in New Mexico's desert environment, and especially when there are known risks related with the activities of a facility.

Fourth, I request that the Commission include a thorough examination of the potential impact to human health and the environment from radioactive and excessive dust associated with operations at the proposed facility. Frequent and sometimes violent dust storms in southeastern New Mexico can spread dust particles for miles ("New Mexico Dust Dirties Wisconsin Town," *Albuquerque Journal*, December 18, 2003). Considering that soil contamination in areas surrounding nuclear facilities is not uncommon, and that soil contamination could remain long after the facility is non-operational, how will LES effectively control the dust generated and prevent the spread of potentially contaminated dust?

Lastly, I request that the EIS include an extensive and thorough examination of the number and quality of local jobs projected by LES should the facility be built. Given the certain need of highly technical skills, that do not exist to any significant degree in Lea County, economic benefits to local residents most likely will not offset the potential toxic burden they could receive. How many and the nature of jobs LES can realistically offer the citizens of Lea County must be properly investigated and documented in order to establish any true economic benefits to the residents of the area.

Thank you in advance for your consideration of the concerns and requests I have posed.

Sincerely,

Coila Ash, Director