

11/8/04
RDB received

From: "Barnes, Melanie" <MELANIE.BARNES@ttu.edu>
To: <nrcprep@nrc.gov>
Date: Mon, Nov 8, 2004 7:13 AM
Subject: comments on Docket No. 70-3103

9/17/04
69FR 56104 (19)

Dear Ms. Anna Bradford,

Thank you for the copy of the Environmental Impact Statement (EIS) for the Proposed National Enrichment Facility in Lea County, New Mexico. I was disappointed that it took so long to arrive. I received it on the 4th of November, the day before leaving for the annual meeting of the Geological Society of America in Denver, Colorado. I truly hope that I am correct in understanding that my comments will be addressed as long as they are sent by e-mail by the 6th of November 2004. It is now 9:30pm Mountain time on the 6th of November 2004 and the first chance I have had to send this e-mail after participating in a public policy meeting all day. Also I was disappointed in the public hearing and the lack of opportunity to address the group in person. The meeting was too long for us to remain and speak after driving two and half hours each way to attend. There was no effort on the persons holding the meeting to allow far travelled individuals to speak first. In past public hearings I have seen the process of allowing those who lived the furthest to speak near the beginning. It was unfortunate that our trip was unsuccessful.

The EIS for Docket No. 70-3103 was fairly informative and comprehensive document, however there are several issues which I would like to see addressed in greater detail.

The first issue is a request to demonstrate scientifically that the hydrogeologic integrity of the area will not be compromised by the construction of retention and detention ponds and septic systems. I feel that this is very important and should be model to include the surrounding area because of the activities on the neighboring properties. There is a quarry, hazardous waste burial site, proposed low level radioactive waste burial site, municipal landfill and oil and gas operations. All of these activities penetrate the ground and disrupt the existing geologic formations. Since the existance of the hazardous waste burial site is predicated on the unique geology and semi-desert conditions it seems that it is imperative to demonstrate that the additional water and penetrations will not effect the existing activities. There is some mention of the Waste Control Specialists Hazardous Waste Burial site but there does not seem to be any consideration of the proximity of these activities and how they might interact with a perched water table which is expected to form at the proposed National Enrichment Facility.

The next issue also arises because of the surrounding land uses. The proposed monitoring program is good but not frequent enough considering that there will be continued disruption of the geologic units by the neighbors and that there is an application by WCS for locating a low level radioactive waste burial site at the existing hazardous waste burial site. I would think that a schedule of monthly or more frequent depending on the weather conditions would be more protective of the environment and human health. An example of conditions which would suggest more frequent monitoring might occur during high winds when there is a potential for blowing dust out of the dry retention pond that was expected to have a small accumulation of uranium and associated chemicals. In addition, during high precipitation events when there is the potential of overflow from the detention pond an hourly sampling would produce data that could be used to quantify the existing concentrations of potential pollutants and thus provide data for modelling environmental effects if an over flow occurs. In addition there was no mention of public access to these data. Where and how frequently will the data be posted? A yearly summary as mentioned is not adequate for an informed public.

Thank you for your attention to these issues.

Sincerely,

Dr. Melanie Barnes
2815 23rd St
Lubbock TX 79410

E-EIDS = ADM-03
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Another issue needing a bit more discussion is the training of a local workforce. There was mention of working with local colleges, however there was no mention of working with the local high schools and possibly providing monies for extra science teachers in order to insure high school graduates who could continue in the fields needed for employment at the National Enrichment Facility.

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