

NRCREP - Scoping Comments on uranium milling GEIS

From: "Mary Cromer" <mcromer@selcva.org>
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Date: 08/30/2007 2:18:06 PM
Subject: Scoping Comments on uranium milling GEIS
CC: "Rick Parrish" <rparrish@selcva.org>

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To Whom It May Concern:

Please find the attached scoping comments in response to the Nuclear Regulatory Commission's Notice of Intent to prepare a Generic Environmental Impact Statement for Uranium Milling Facilities published in the Federal Register on July 24, 2007.

Also, please confirm receipt of these comments.

Thank you for your time and consideration,

Mary Varson Cromer
Associate Attorney
Southern Environmental Law Center
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August 17, 2007

Chief, Rules Review and Directives Branch
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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

DELIVERED TO: nrcprep@nrc.gov
RE: Uranium Recovery GEIS

To Whom It May Concern:

The Southern Environmental Law Center (SELCO) submits these comments on the scope of issues to be considered by the Nuclear Regulatory Commission (NRC) in its preparation of a generic environmental impact statement (GEIS) on the environmental impacts associated with uranium milling. With these comments, SELCO requests first that that NRC analyze the impacts of uranium processing in the eastern part of the United States and second that NRC include conventional milling as well as in situ leaching (ISL) facilities in its review.

While all U.S. ISL and conventional uranium milling operations are currently west of the Mississippi, the situation is likely to change soon. The prospect of uranium production in Virginia has been a latent issue for a number of years and is again coming to the fore. As of 1981, Marline Uranium Corporation had leased 53,000 acres of Virginia land for the purpose of uranium mining and milling. Ben A. Franklin, *Search for Uranium Deposits Divides Virginians*, NEW YORK TIMES, Nov. 15, 1981. Despite the company's best efforts, Virginia legislatures did not develop a regulatory system in time to allow uranium mining in the state before the price of uranium dropped in the mid-1980s. Marline Uranium Corporation disbanded after having spent nearly \$9 million exploring Virginia's uranium deposits. *Id.* By all accounts, Marline Uranium's core samples revealed substantial deposits of uranium in the southeastern part of the state, with the most substantial deposit, the Coles Hill deposit, in Pittsylvania County.

Now that the price of uranium has risen and the long-term demand projections for the fuel source are more promising, interest in mining Virginia's uranium deposits has renewed. The most recent draft of the Virginia Governor's energy plan finds that the possibility of uranium mining in the state warrants careful analysis and specifically notes the possibility of mining two million tons of uranium per year from the Coles Hill deposit. The Plan acknowledges that before

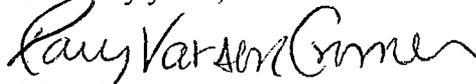
allowing such mining, Virginia would have to develop a regulatory system for uranium mining and milling and lift a moratorium put in place in the early 1980s.

Because of the strong prospect of uranium mining in Virginia, SELC asks that NRC expand the geographic focus of its GEIS to include analysis of uranium production's likely environmental impacts in the eastern part of the United States. Any analysis of impacts of uranium production in the West cannot be extrapolated to new eastern ISL or conventional milling facilities because of the differences in climate, hydrology, geology, and population density.

Additionally, SELC requests that NRC include conventional uranium milling in its analysis. Based on Marline Uranium Corporation's exploratory drilling in the 1980s, a rich uranium deposit lies near the surface at the Coles Hill site and slants downward. The company's original mining proposal relied on a combination of open-pit and underground mines to remove the accessible deposit. Based on what is known about the geology of the Coles Hill deposit, ISL likely would not be the desired mode of uranium production. Because of the likelihood of conventional mining and milling of the Coles Hill deposit and the possibility of conventional mining and milling at other sites around the country, SELC requests that NRC include an analysis of conventional milling in its GEIS.

Thank you for the opportunity to submit these comments. We look forward to working with you throughout this process.

Sincerely yours,



Mary Varson Cromer
Associate Attorney