



ALASKA MINERS ASSOCIATION, INC.

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Chief, Rules Review and Directives Branch
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RULES AND DIRECTIVES
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USNRC

RE: Review of General Environmental Impact Statement (GEIS) to assess the potential environmental impacts associated with uranium recovery at milling facilities employing the in-situ recovery (ISR) process

Dear GEIS Team,

Thank you for the opportunity to comment on the proposed GEIS to assess the ISR process for uranium. The Alaska Miners Association is a non-profit membership organization established in 1939 to represent the mining industry. The AMA is composed of individual prospectors, geologists and engineers, vendors, small family miners, junior mining companies, and major mining companies. Our members look for and produce gold, silver, platinum, diamonds, lead, zinc, copper, uranium, coal, limestone, sand and gravel, crushed stone, armor rock, etc. Our members live and work throughout Alaska and are very interested in implementing appropriate permit processes that will allow for responsible development of Alaska's mineral resources.

AMA strongly supports the preparation of a GEIS to assess potential environmental impacts associated with in-situ recovery (ISR) of uranium. The development of a GEIS is logical, environmentally sound and cost effective for both the NRC and for the regulated public. There are numerous reasons why a GEIS for ISR is appropriate and does not in any result in a lower standard of environmental protection:

1. ISR projects are similar in nature. The recovery methods that have been developed and perfected over the past several decades are virtually identical where ever they are utilized.
2. The geology of the deposits that are amenable to ISR is similar. Uranium deposits amenable to the ISR method are found in similar fluvial, roll-front settings within underground aquifers.
3. The aquifers containing deposits amenable to the ISR method are specifically exempted by the Environmental Protection Agency as potential drinking water sources because they are unsuitable for human consumption due to the presence of radionuclides and other potentially hazardous constituents. ISR of uranium therefore does not contaminate drinking water sources.
4. ISR uses non-toxic leaching agents such as oxygen with carbon dioxide injected into the ore deposit to dissolve the uranium.

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B. Von Till (rww)

5. ISR removal of uranium would be cleaning up potential contaminants to the public health that are already in the environment. Removal of these contaminants would lead to improved water quality and that at no cost to the government or the public.
6. ISR is a known process with a well established environmental track record. It is typically the preferred alternative for uranium recovery because of its minimal adverse environmental, public health and safety impacts.
7. A GEIS will promote an efficient and effective use of NRC resources by minimizing duplication of effort. This will allow the agency to focus on the most important issues and site-specific project considerations that will vary between projects.
8. A GEIS does allow for additional public involvement in site-specific issues. This will result in less duplication of effort related to relatively unimportant issues and greater efforts focused on resolving important site-specific problems.
9. In its regulations, the Council on Environmental Quality (CEQ) has specifically identified the use of programmatic/generic EISs to streamline the environmental assessment process.
10. Use of a GEIS will greatly reduce the cost of NEPA compliance for the NRC while still ensuring effective evaluation of impacts to the environment from each possible alternative and provide for the same level of public involvement.
11. Use of a GEIS will allow permittees to focus on the most significant issues in a project without the potential duplication, confusion and huge bulk of information that would otherwise be in play if the GEIS was not completed and available. The GEIS would greatly reduce the effort and cost to the permittees while still ensuring the same level of comprehensive environmental evaluation.
12. Use of a GEIS will help minimize the superfluous legal challenges to projects while still providing the same level of public involvement.

We urge the NRC to pursue the development of a GEIS in the most expeditious manner possible that will result in a legally robust and defensible product.

Thank you for the opportunity to comment on this issue.

Sincerely,



Steven C. Borell, P.E.
Executive Director

Cc: Senator Ted Stevens
Senator Lisa Murkowski
Congressman Don Young
Governor Sarah Palin