

NRCREP - GEIS scoping comments

From: "Jill Morrison" <jillm@powderriverbasin.org>
To: <nrcprep@nrc.gov>
Date: 09/04/2007 4:55:11 PM
Subject: GEIS scoping comments

7/24/07
72FR 40844
374

ENCOURAGING RESPONSIBLE DEVELOPMENT TODAY - FOR TOMORROW

934 N. MAIN ST. SHERIDAN, WY 81301 (307) 672-5809 FAX (307) 672-5800
INFO@POWDERRIVERBASIN.ORG WWW.POWDERRIVERBASIN.ORG



September 4, 2007

Chief
Rules Review & Directives Branch
US Nuclear Regulatory Commission
Washington, DC

EMAIL Comments submitted to:
nrcprep@nrc.gov

RE: Uranium Recovery GEIS

Dear Chief and Staff Members,

The Powder River Basin Resource Council is submitting the following written comments in response to the Federal Register Notices on the NRC Notice of Intent to prepare a Generic Environmental Impact Statement for Uranium Milling Facilities.

The Powder River Basin Resource Council (Powder River) was formed in 1973 by ranchers and concerned citizens of Wyoming to address the impacts of mineral development on rural people and communities. The organization works for the preservation and enrichment of our agricultural heritage and rural lifestyle; the conservation of our unique land, mineral, water, and clean air resources, consistent with the responsible use of those resources to sustain the livelihood of present and future generations; and the education and empowerment of our citizens to raise a coherent voice in the decisions that will impact their environment and lifestyle.

These written comments are in addition to oral comments that we submitted at the Casper hearing on August 7th, 2007.

First, we request the NRC extend the deadline for public scoping comments on this proposal beyond the September 4th

*SUNSI Review Complete
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*ERFDS = ADM-03
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09/13/2007

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deadline. We request this extension because members of the public, especially potentially impacted citizens, only recently found out about this Generic EIS on uranium mining and have not had an adequate opportunity to review the notice and submit comments.

Second, like numerous other organizations nation- and region-wide, Powder River and its more than 1,000 members across the Basin have serious reservations about the use of a "generic" Environmental Impact Statement. Please provide some background or details on when and where a "Generic" Environmental Impact Statement has even been produced and how a "generic" EIS meets the requirements of NEPA. The NRC's proposal to produce a "Generic" EIS for uranium mining may not be the most effective or informative way to use the NEPA process to address the proposed and very important site specific impacts of uranium mining across the West.

The Western United States is vast area with unique regional and local variations that cannot adequately be addressed in a "Generic" EIS. Is it the intent of the NRC to use this Generic EIS and then tier off that document with smaller Environmental Assessments?

Please explain how the NRC will ensure a thorough EIS analysis on localized uranium mining proposals that will meet the requirements of NEPA to fully explore the alternatives, a disclosure of local environmental impacts, mitigation measures and provide adequate notice for public input and state and federal agency review and participation.

Please provide a specific example of how the NRC would ensure a NEPA analysis on In Situ Leach mining proposals in the Powder River Basin.

An EIS should fully cover the following areas:

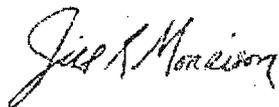
- A disclosure of all proposed areas for uranium mining. The corporations, including names and addresses, who are submitting applications proposing uranium mining operations. If the companies are foreign corporations or affiliated with foreign mining companies where they are based. The EIS should also provide a history and the track record of the corporations involved in uranium mining including their years of involvement in the industry, record of violations and cleanup operations, etc.
- A full disclosure of the history of uranium mining in the area covered by EIS including specifics on the history of contamination, health impacts and deaths directly related to uranium mining operations, impacts to specific communities, violations and the record of problems associated with clean-up and reclamation of uranium mining locations.
- A disclosure and analysis of how uranium leases are acquired and the specific rights of surface landowners where uranium mining has taken place and is proposed.
- A disclosure and analysis of impacts to ranching operations, livestock and wildlife.
- A disclosure of impacts to groundwater, requirements for protection of groundwater and surface water resources. Please provide specifics on the class of use of each aquifer potentially impacted by uranium mining. Specifics on the failures of groundwater restoration at ISL uranium mining sites. The numbers and specific locations of domestic, municipal and livestock wells and water supplies that will potentially be impacted. Please provide specific information on the requirements for groundwater clean up and the specific instances where NRC or state agencies have permitted contaminated groundwater to remain by approving relaxed groundwater standards at

several uranium mining sites. Please provide a list of locations where NRC has permitted relaxed clean up and decommissioning operations.

- A disclosure of overlapping impacts with CBM dewatering operations and uranium mining impacts.
- A disclosure and analysis of the bonding and cleanup requirements and mitigation measures for impacts to the land, air and water resources.
- A disclosure of all uranium mining facilities required and an analysis of the miles of new roads required and existing roads to be used with an analysis of the volume of traffic and impacts to county roads and resources to maintain roads. This analysis should include a cumulative analysis of the overlapping impacts with coalbed methane development, other gas development or coal mining development.
- A disclosure and analysis of safety issues regarding the transportation of yellowcake from mining facilities and an analysis of how the homeland security issues associated with this transportation will be addressed.
- An analysis of the overlapping impacts to landowners, livestock and wildlife of proposed uranium mining and other adjacent mining activities and how those will be addressed and mitigated.
- An analysis of habitat fragmentation impacts and impacts to sage grouse and other species of concern from proposed uranium mining operations.
- An analysis of the socio-economic impacts to communities including an analysis of the cumulative impacts on those communities already overburdened by impacts from booming oil and gas and coal development resulting in overtaxed county services for roads, police, crime, drug abuse, emergency response, affordable housing and labor shortages.
- How does the NRC permit uranium mining by foreign corporations? Do we permit uranium mining by any foreign corporation, for example, Iran, North Korea, China, India, etc. If the mining company is from Canada, for example, what oversight does NRC have of where that uranium is sold?
- Please explore a full range of alternatives for uranium mining as required by NEPA. We ask that you include as an alternative for review that: ISL mining will not be permitted in aquifers that currently serve as drinking water now or could in the future because in situ uranium leaching contaminates aquifers and restoration to drinking water class of use is not possible.

Thank you for the opportunity to provide comments. We request that you keep us informed of any developments and make sure you keep us on our mailing list.

Sincerely,

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Jill Morrison
Powder River Basin Resource Council

Jill Morrison
Powder River Basin Resource Council
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Sheridan, WY 82801
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Subject: GEIS scoping comments
Creation Date Tue, Sep 4, 2007 3:24 PM
From: "Jill Morrison" <jillm@powderriverbasin.org>

Created By: jillm@powderriverbasin.org

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Powder River Basin Resource Council