

NRCREP - Final CACC comment letter uranium mining

From: Kay Cumbow <kcumbow@greatlakes.net>
To: <nrcprep@nrc.gov>
Date: 09/05/2007 12:04:37 AM
Subject: Final CACC comment letter uranium mining
CC: <URANIUM RECOVERY GEIS>

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Citizens for Alternatives to Chemical Contamination
Member of the Michigan Environmental Council and
EarthShare of Michigan
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Chapter Organizations:
Huron Environmental Activist League

September 4th, 2007

Chief, Rules, Review and Directives Branch,
Mail Stop T-6D59,
U.S. Nuclear Regulatory Commission,

Washington , D.C.20555-0001

Citizens for Alternatives to Chemical Contamination (CACC) is a grassroots environmental education and advocacy organization dedicated to the principles of social and environmental justice, pollution prevention, citizen empowerment, and protection of the Great Lakes ecosystem. The majority of our members reside in

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Michigan.

This letter is in response to the U.S. Nuclear Regulatory Commission's Federal Register notice dated July 24, 2007 regarding the scope of the proposed Generic Environmental Impact Statement ("GEIS") for in situ leach ("ISL") uranium mining.

It appears to us that a scoping process that leaves out public hearings on site-specific environmental issues sacrifices the environment right in the beginning for big business.

The scoping process is woefully deficient. There were only two public meetings scheduled - one in Casper, Wyoming and one in Albuquerque, New Mexico - none in other areas of the country. With a uranium mining boom, this is unacceptable. Apparently, a special meeting was held with the National Mining Association in Washington, D.C. None of these communities are the site of any proposed ISL mining operations.

Communities that face proposed ISL mining such as Grants, Gallup, Crownpoint and Church Rock, New Mexico were ignored. Additionally, the NRC has ignored entire states, such as Utah, Arizona, Colorado and South Dakota, where ISL mining is proposed, and other states such as Michigan, where test drilling for uranium is taking place. - The NRC should, at a minimum, extend the comment period for 60 days for the entire U.S., so that any state that may face the prospect of uranium mining in the future may have a meaningful voice.

Public hearings, not meetings, should be held regarding this proposal, in communities that are known to be looking at ISL mining, as well as at least one hearing held in each NRC region throughout the states.

Uranium deposits are not confined to only two of the United States. That ISL mining is not proposed currently in a region, should not be a deterrent to letting the taxpayers, whose communities' health and economic welfare is tied to the fate of their aquifers, have a voice for any future uranium mining and exploration.

There are many alternatives for energy production, that are much more cost-effective and far less polluting than mining uranium for the manufacturing of nuclear fuel rods for expensive and unsafe nuclear power plants. One purpose of NEPA is that true alternatives are studied that are less environmentally damaging. CACC requests that NRC look at environmentally sustainable energy alternatives in a thorough manner. Because a GEIS could disregard, for instance, critical habitat, headwaters, proximity to local agriculture, the presence and proximity to aquifers, endangered species, including aquatic species -and much more - and also could disregard input from those residents, local biologists and scientists who know the area best, CACC is opposed to a GEIS at this time.

Because uranium mining in any form presents formidable odds against cleaning up the devastating pollution left in it's wake -and especially with the acidic, radioactively contaminated drainage that can occur with in situ leach uranium mining - and with this being the most utilized form of uranium mining in the United States, then, any proposed ISL uranium mining should be subjected to a Environmental Impact Statement. Site-specific issues are the heart of assessing the environmental impact of proposed ISL operations - and meaningful public participation and a rigorous environmental analysis are critical.

Thank you for this opportunity to submit comments on this critical matter, and please keep CACC informed of all developments with regard to this proposed GEIS.

Sincerely,

Kay Cumbow

Advisory Committee to the Board,
Citizens for Alternatives to Chemical Contamination
8735 Maple Grove Road,
Lake, MI 48632

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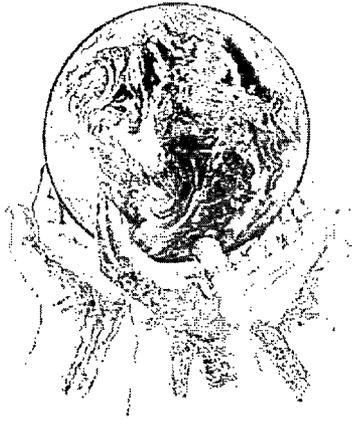
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Recipients

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