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Date: Sat, Sep 22, 2007 4:42 PM
Subject: Comments on Scoping: Generic Environmental Study of Uranium Recovery Operations

Sir or Madam - please see my comments attached - steven h brown

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September 22, 2007

Subject: Comments on the Scope and Development of the Generic Environmental Impact Statement for Uranium Recovery Operations

Sir or Madam:

My name is Steven H Brown and I have worked for over 35 years in the nuclear industry including as an operator (ESH manager, Radiation Safety Officer) for a number of ISR facilities (Uranium Solution Mining, U In Situ Leach). I fully support NRC's intention of developing Generic EIS / ER type documents. I believe such an approach can significantly expedite the licensing process by addressing key safety, environmental and public protection issues that are truly "generic" (inherent in the nature of virtually all ISR designs and facilities, e.g.) in a singular, comprehensive manner. This then would allow limited resources (NRC, State, Licensee, NGOs) to be focused on specific facility/design and/or local aspects and issues associated with the license application and submittal review process.

However, the primary purpose of my comments herein are to make sure you are aware that during earlier generations of Uranium ISR/ISL operations in the U.S., we did make extensive measurements and published observations and associated empirical data that relate directly to environmental and radiological characteristics and potential impacts of Uranium ISR/ISL facilities. Examples are provided below:

1. "Radiological Aspects of In Situ Uranium Recovery (An Update)"; Brown, S.; Proceedings of Eleventh International Conference on Environmental Management (ICEM'07); American Society of Mechanical Engineers, 2007 (expected publication October, 2007 – contact author at shb12@msn.com for pre publication copy)
2. "Radiological Aspects of Uranium Solution Mining"; Brown, S.; In: Uranium, 1; p37-52, Elsevier Scientific Publishing Co. 1982
3. "A Model for Developing the Radon Loss (Source) Term for a Commercial In Situ Leach Uranium Facility"; Brown, S. and Smith, R.; In: Radiation Hazards in Uranium Mining – Control, Measurement and Medical Aspects; M Gomez (Editor); Society of Mining Engineers pp 794-800; 1982 (Library of Congress Card Number 81-70691; ISBN 0-89520-290-5)
4. "Environmental Assessment of In Situ Mining"; Kasper, D.R., Martin, H.W., et al; U.S. Dept. of Interior, Bureau of Mines Report No. 101-80, 1979 (Available as NTISPB81 – 106783)

It is recommended that the NRC staff (and the National Mining Association and their contractors working on a related GER) avail themselves of these reports and this data. Furthermore; you may consider it of value to interact and communicate directly with the individuals possessing this experience. I would humbly suggest that making available to this process of national importance the "best science" and available "quality data" is clearly in the public interest and supportive of our national energy strategies moving forward,

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