

From: Carolyn Maddux <cmaddux@hctc.com>
To: <NRCREP@nrc.gov>
Date: 8/29/2007 11:50:30 PM
Subject: Uranium Recovery GEIS

To Whom It May Concern:

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

We oppose a GEIS for these reasons:

There must be public input about whether a GEIS is desirable. Adequate control of ISL operations is site-specific; the usefulness of a GEIS is dubious at best. The process as it stands gives the impression that drafting a GEIS to expedite the ISL licensing process was a foregone conclusion.

Only two public meetings have been scheduled for scoping -- one in Casper, Wyoming and one in Albuquerque, New Mexico. A special meeting with the National Mining Association was held in Washington, D.C.; this does not provide for public input. Significantly, none of these communities is 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. The NRC has ignored entire states, such as Utah, Arizona, Colorado and South Dakota, where ISL mining is proposed.

The NRC should, at a minimum, extend the comment period and schedule public meetings in communities that will be affected by ISL mining.

If the NRC has concluded, as it appears to have already done, that a GEIS should be drafted, its scope should be very limited. To conclude that hydrology, water quality, geology, socio-economics, and cultural resources in places as diverse as northwest New Mexico and south Texas -- where ISL mining is ongoing and proposed -- can be evaluated in a generic manner is absurd. These issues can only be evaluated on a site specific basis with a site specific environmental impact statement.

Leaving important site-specific issues to evaluation in an environmental assessment ("EA") is insufficient. Public participation and environmental analysis requirements under the National Environmental Policy Act are much less stringent for EAs than for EISs. Because site-specific issues are so central to assessing the environmental impact of proposed ISL operations, significant public participation and a rigorous environmental analysis are critical. Such issues should not be left for an EA. The public must be included and made aware of the issues at each site.

Thank you for the chance to comment.

Sincerely,

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