

From: Ward Hodge <wdhevergreen@earthlink.net>
To: <NRCREP@nrc.gov>
Date: 8/31/2007 2:16:33 PM
Subject: Uranium Recovery GEIS

To Whom It May Concern:
Kind Ladies and Gentlemen:

This will be an easy letter to write. In my 85 years, I have never seen such flagrant and unique examples of anti-people, anti-future so-called government policies proposed to destroy constituents faith in public servants.

How can anyone even consider a simple generic EIS for future uranium mining without Public input at this late date. Is there no shame in our nation's Capitol?

Especially in a state that is nearly bankrupt financially, and exposed to all kinds of environmental nonsense in the name of "MORE JOBS"

I would not be saying some of these things if I did not know what I was talking about. NUCLEAR POWER and NUCLEAR ARMAMENTS of all kinds are out of date. They are strictly nineteenth century thinking designed to solve 20th century problems in the 21st. century. Is that what you want? Or are you just interested in promoting more corporate policy to satisfy greedy stockholders, of which there are too many.

This filthy, expensive, time and resource consuming technology is a mistake in any dimension.

How much do you really know about the history of uranium processing since the late 1930's. We are still paying taxes and utility bills to pay for clean-ups left over from WW II. Did you know that?
Or doesn't it make any difference, as long as you

get your slice of the corporate lobby pie.

I could go on for hours.
This idea is so far beyond
reality that I had to
check my sources before
I started this letter.

Things are just as unreal
in Canada. Ask the ARDOCH
ALGONQUIN First Nation
about this witches brew
hatched in a corporate
board room some where.

Doesn't the public have any say about the future?

So, this is my 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.

I write to oppose a GEIS. The reasons are many.

First, the process by which the NRC arrived at its conclusion to draft a GEIS is fundamentally flawed. There was no public input about whether a GEIS is needed or desirable. Given the site-specific nature of ISL operations, the usefulness of a GEIS is dubious at best.

This process gives the impression that drafting a GEIS that would expedite the ISL licensing process was a foregone conclusion.

Second, the scoping process itself has been deeply flawed. Only two public meetings have been scheduled on this matter - one in Casper, Wyoming and one in Albuquerque, New Mexico. Additionally, a special meeting with the National Mining Association was held in Washington, D.C.

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. Additionally, 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.

Third, if the NRC has concluded, as it appears to have already done, that a GEIS should be drafted, its scope should be very limited. ISL mining is inherently constrained by site specific considerations. To conclude that the 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 on its face. These issues can only be evaluated on a site specific basis with a site specific environmental impact statement.

Finally, relegating these important site specific issues to evaluation in an environmental assessment ("EA") is unacceptable. The public participation and environmental analysis requirements under the National Environmental Policy Act are much less stringent for EAs than for EISs.

Because the site specific issues are so central to assessing the environmental impact of proposed ISL operations, meaningful public participation and a rigorous environmental analysis are critical. Such issues should not be left for an EA. In fact, in the August 13, 2007 issue of the Gallup Independent, the NRC's Office of Federal and State Materials and Environmental Management Programs Branch Chief Gregory Suber stated that "the potential for fewer public meetings is there" with the EA process.

Thank you for the opportunity to submit my comments on this matter, and please keep me apprised of developments with regard to the GEIS.

Sincerely,

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