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To: <NRCREP@nrc.gov>
Date: 9/1/2007 9:35:46 AM
Subject: Uranium Recovery GEIS

To Whom It May Concern:

I am strongly opposed to the Nuclear Regulatory Commission's proposed Generic Environmental Impact Statement ("GEIS") for in situ leach ("ISL") uranium mining.

ISL operations are very site specific and a GEIS would not take into consideration the different environments that mining would occur.

A GEIS would expedite the ISL licensing process and not enough time would be sent on analyzing the potential environmental and health impacts.

More input from communities that would actually be affected by ISL need to be addressed. As of now, these communities have been ignored.

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

Please remember that 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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