



WYOMING MINING ASSOCIATION

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WMA Comments on GEIS Scoping Meeting

My name is Marion Loomis. I am the Executive Director of the Wyoming Mining Association (WMA). I represent bentonite, coal, trona and uranium producers in Wyoming. As you probably know Wyoming leads the nation in production of uranium with about 2 million pounds of production. Since the increase in the price of uranium the last two years, we have seen tremendous activity in uranium exploration in Wyoming. We feel it is very important that the United States use more uranium produced from secure sources in the US and Wyoming contains the largest reserves in the nation. If our nation is ever going to reduce our reliance on foreign sources of energy, it is imperative that we produce a significant portion of the 50 million pounds of uranium used in US nuclear power plants from domestic sources. In order to do that it is critical that the permitting of new facilities proceed in logical and timely manner.

- WMA supports the Nuclear Regulatory Commission (NRC) initiative to prepare a Generic Environmental Impact Statement (EIS) for in situ recovery (ISR) uranium mining. There are a number of pending ISR projects in Wyoming and other States that will benefit from NRC efforts to assess the common environmental aspects and impacts of these low impact facilities on a generic basis. This will reduce the cost and time involved in licensing these projects and will allow the NRC staff to concentrate on the site specific aspects of each project.
- WMA supports NRC updating the 1980 Generic EIS for conventional uranium milling. There are several existing facilities that have announced plans to resume production at a future date and at least one new milling facility has been announced. The 1980 GEIS (NUREG-0708) is out of date but could be updated to assess new milling techniques and technologies and their environmental impacts.
- WMA believes that an update to the conventional uranium milling GEIS should be performed independent of the preparation of a generic EIS for ISR mining.
- WMA is concerned that the effort to prepare Generic EISs for conventional milling and ISR mining may adversely affect progress by the staff on pending and future license applications. Therefore WMA encourages NRC to use outside resources to supplement NRC staff in preparing the draft documents to avoid any adverse impacts to NRC review of pending license applications.
- WMA believes that a Generic EIS for in situ recovery and updated Generic EIS for conventional uranium milling will provide potential licensees with up to date guidance and information on environmental impacts of ISR and uranium milling that will improve future baseline environmental evaluations and license applications.

Thank you for opportunity to present these comments.