

NRCREP Resource

From: Savignac, Noel (E-mail) [noelsav@swcp.com]
Sent: Wednesday, September 10, 2008 6:52 PM
To: NRCREP Resource
Subject: Uranium Recovery GEIS
Attachments: NFS NUREG 1910 comments 9-10-08.doc

Attached are comments on NUREG-1910.

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SUNSI Review Complete
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1 E-RFDS = ADM-03
Add = J. Park (JRP)

September 10, 2008

Chief, Rulemaking, Directives, and Editing Branch

Mailstop: T6D59

U.S. Nuclear Regulatory Commission

20555-0001

Re: Comments on NUREG-1910, "Generic Environmental Impact Statement for In-Situ Leach Uranium Milling Facilities."

Dear Sir:

Comments on NUREG-1910 are listed below by Section Number:

3.3.6.1 Meteorology

The section states that climatic data are available from the National Climatic Data Center, 2004. It would be helpful if a more specific reference were provided for the climatic data that is needed to run MILDOS, which is the computer code used to calculate radiation doses to off-site residents around the uranium extraction facility. Those data are the wind speed frequencies by stability class and compass direction in the STAR format and are difficult to find.

4.2.11.2.1 Operation Impacts to Public and Occupational Health and Safety

The section states: "Releases which are assumed to be particulates are uranium-238, thorium-230, radium-226, and lead-210." The statement should be revised because the only effluents from an in-situ leach uranium facility are radon-222 and uranium-natural from facilities without a vacuum dryer. The circuit transporting water from the extraction wells to the IX columns and then to the injection wells is closed with no particulate emissions.

8.2 Airborne Radiation Monitoring Program

Add gamma monitoring to the program.

Appendix A Section 3 Scope of GEIS and Summary of Issues to be Addressed

Radiological effluents and the radiation doses to nearby residents and nearby communities are important issues due to the public's concern about radiation. Those topics should not be buried in the subsection "Public and Occupational Health" but should be separate sections in the GEIS on an equal level with "Water Resources", "Ecology", and "Historic and Cultural Resources."

Comments provided by:

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