

URGEISCEmails

From: Terry Everard [sundancekid@rangeweb.net]
Sent: Sunday, October 05, 2008 9:25 PM
To: NRCREP Resource
Subject: Uranium Recovery GEIS
Attachments: GEIScomments9-08.doc

Please accept my comments on the draft GEIS for In-Situ mining. Thank you, Terry

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This letter is to express my concerns about the U.S. Nuclear Regulatory Commission's (NRC) proposal to implement the Generic Environmental Impact Statement (GEIS) for in-situ leach (ISL) for uranium recovery. By definition the generic process is just that... generic. How can this process be used to review unique situations at individual sites? For example, in the proposed ISL mining areas of Crook County, Wyoming, there are thousands of old exploratory drilling holes from the 60's and 70's. According to local landowners and the Wyoming State Engineer's office, most of these holes were not logged nor properly cemented in before they were abandoned. Therefore, if these areas are to be flooded for ISL today, there is a high risk that some of these abandoned well holes could allow excursions of polluted recovery water into valuable drinking water aquifers in the region. This, along with the unique geology of each site, demand that each proposed ISL receive a site-specific environmental review before the permitting process may continue.

Wyoming's lone operational ISL mine – “Smith Highland Ranch” – near Douglas has long been touted by industry as a shining example of how great the process works. “Unfortunately this is not the case,” Wyoming Department of Environmental Quality (DEQ) land quality District 2 supervisor Mark Moxley wrote in a Nov. 21, 2007 report. On March 10, 2008, DEQ issued a notice of violation to Power Resources Inc. (PRI), a wholly-owned subsidiary of Cameco Corp., detailing alleged violations pursuant to two permits. The permitting process allows Power Resources Inc. to conduct its own monitoring for Quality Assurance and Quality Control (QAQC). Current DEQ administrator John Corra said “it was an anonymous tip that prompted then DEQ land quality administrator Rick Chancellor to conduct an investigation of the Smith-Highland Ranch uranium mine, which falls within the division's District 1”. Beginning in October 2007, Mr. Chancellor brought in the division's District 2 supervisor, Mark Moxley, to lead the investigation in order to get a "fresh set of eyes" perspective. The report on PRI's operation by Moxley states that “there are a number of major long-standing environmental concerns at this operation that demand immediate attention.” The violations include “serious deficiencies with both permits,” inadequate reclamation, an inordinate number of spills, leaks, an excursion, inadequate bonding and problems with staffing. Obviously, allowing the fox to watch the hen house does not work. A third party review team to conduct QAQC is the only way to keep the industry honest about the environment impacts of their mining operations. Take a look at the long history the mining industry has had in the western states and the number of mining sites that today are superfund sites. Considering the ISL process is only a 20-year old industry, how soon will we have a superfund site?

According to the NRC's findings in the draft GEIS, one resource area “with small to large potential impact” is groundwater. Allowing a permitting process to proceed with potential large impacts to our groundwater without site specific review is unacceptable. In rural Crook County, over 95% of the landowners are dependent upon quality groundwater to make a farmstead functional. To allow any form of potential impact on our ground water is unacceptable. I have been taught to be a good steward of our land and to do everything possible to leave the land in better shape than when I acquired it. From what I have read, there is not one ISL reclamation project in North America that

can make this claim nor can it make a claim of restoring the ground water to the original condition. In most cases, the pollutant parameters are changed to allow less stringent conditions or the aquifer is no longer declared a drinking water source. Again, this is unacceptable to rural residents who depend upon ground water for their existence.

Considering these reasons, I ask the NRC to not implement a “fast track” generic process to review a mining process that could have huge impacts on rural ground water in our county. If mining is to occur, I request a full review of the environmental impacts on a site specific basis. I would also require a third-party monitoring review process implemented in order to avoid the same mistakes made at the Smith Highland Ranch ISL project. If the mining companies knew there was a third party review, maybe they would take this process more seriously and do a better job. Additionally, I think it would be wise to allow another 180 days for public comment, as this draft GEIS was only recently released to the public.

Thank you for allowing us to comment on this process.

Sincerely,

Terry Everard
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