
From: Alyssa Go [ago@nrdc.org]
Sent: Friday, April 24, 2009 7:50 PM
To: Stephen Cohen
Subject: Draft RIS on Pre-Licensing Construction Activities at Proposed Uranium Recovery Facilities
Attachments: Req for Comment Extension NRC Ur RIS 2008-4-24.pdf

Hi Mr. Cohen,

NRDC and three other public interest organizations are respectfully submitting the attached request for a deadline extension for comments on the NRC's proposed *draft RIS on Pre-Licensing Construction Activities at Proposed Uranium Recovery Facilities*. We have mailed this letter via First Class Mail to the Chief of the Uranium Recovery Licensing Branch, but are also sending you this electronic copy since no other email address had been provided in the Federal Register Notice. If there is another email contact I should forward this on to, please let me know.

Thank you in advance for your consideration,

Alyssa Go

Alyssa Go
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X-MID: 1580475

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([192.168.63.31]) with Microsoft Exchange Server HTTP-DAV ; Fri, 24 Apr 2009
23:53:10 +0000

User-Agent: Microsoft-Entourage/12.15.0.081119

Date: Fri, 24 Apr 2009 19:49:50 -0400

Subject: Draft RIS on Pre-Licensing Construction Activities at Proposed
Uranium Recovery Facilities

From: Alyssa Go <ago@nrdc.org>

To: <stephen.cohen@nrc.gov>

Message-ID: <C617C85F.63C5%ago@nrdc.org>

Thread-Topic: Draft RIS on Pre-Licensing Construction Activities at Proposed
Uranium Recovery Facilities

Thread-Index: AcnFN1so/au99ax9QCO1VsE4tB9Rog==

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Return-Path: prvs=ago=35857c5a2@nrdc.org

Energy Minerals Law Center * Natural Resources Defense Council
Southwest Research and Information Center * Western Mining Action Project

April 24, 2009

Via Electronic and First Class Mail

Chief, Uranium Recovery Licensing Branch
Division of Waste Management and Environmental Protection
Office of Federal and State Materials and Environmental Management Programs
U.S. Nuclear Regulatory Commission
Mail Stop T-8F5
Washington, D.C. 20555-0001
Electronic Mail: stephen.cohen@nrc.gov

RE: Extension of time for public comment on the Nuclear Regulatory Commission's proposal for a *Draft Regulatory Issue Summary (RIS)* on *Pre-Licensing Construction Activities at Proposed Uranium Recovery Facilities*

Dear Sir/Madam:

Representing the combined membership of over one million concerned citizens across the United States, the Energy Minerals Law Center, Natural Resources Defense Council, Southwest Research and Information Center, and Western Mining Action Project write today to respectfully request that the Nuclear Regulatory Commission (NRC) extend the deadline for public comment an additional sixty (60) days on its proposal for a *Draft Regulatory Issue Summary on Pre-Licensing Construction Activities at Proposed Uranium Recovery Facilities* (hereinafter "Draft RIS") 74 Fed. Reg. 13483 (March 27, 2009). The current deadline for comments is April 27, 2009.

Uranium mining, both in-situ leach (ISL) and conventional mining, has significant environmental and public health impacts during all phases of operations. The activities described and allowed for in the Draft RIS prior to license approval could result in significant impacts and, importantly, potentially prejudice licensing and its associated decisions. In the brief 30 day window provided by the NRC for comments on this important matter, the undersigned organizations have not had the opportunity to develop the comprehensive and technical comments the issue merits.

In addition to this Draft RIS, we understand that the NRC is (1) finalizing for a June 2009 release its *Draft Generic Environmental Impact Statement for Uranium In-Situ Leach Milling Facilities* and (2) crafting a draft groundwater rulemaking for in-situ leach mining (despite requests from NRDC and others, the NRC has not seen fit to share the proposed groundwater protection rule). Both of these agency actions, the Draft GEIS and a proposed groundwater protection rule, are affected by (and could themselves impact) potential changes to pre-licensing construction activities at uranium recovery sites.

For these reasons, we request at least a 60 day extension of time so that the public may have an opportunity to fully integrate any comments we may make on the Draft RIS with the results of the more comprehensive, ongoing regulatory processes.

Please do not hesitate to contact us if you have questions or concerns. Thank you for your prompt attention and consideration of this matter.

Sincerely,

_____/s/
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(Signatures verified upon request)*

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