
From: Mike Griffin (USA) [Mike.Griffin@uranium1.com]
Sent: Monday, July 06, 2009 12:12 PM
To: Shroff, Behram
Cc: Fliegel, Myron; Jon Winter (USA)
Subject: FW: Request for clarification of ER RAI question

Hi Behram:

Do you have a status on clarification to the following email concerning ecology impacts of boring?

As a follow-up on our responses to the remaining RAI questions, I believe that we should be able to complete all of them by the end of next week. We are having some delays caused by NRC\NMA Workshop and vacations that were not foreseen.

Thanks,

Mike

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From: Mike Griffin (USA)
Sent: Tuesday, June 23, 2009 2:23 PM
To: Behram Shroff (Behram.Shroff@nrc.gov)
Cc: Jon Winter (USA)
Subject: Request for clarification of ER RAI question

Hi Behram:

We are working on completing our responses to the RAI for the Moore Ranch Environmental Report and I need some further clarification on a question related to the Ecology Impacts discussion. The second question for section 3.5.5 states: *Provide information on the impact of exploratory or delineation borings on local ecology.*

On May 19, we requested clarification of this question as follows: *Impacts from exploration or delineation borings are contained in the analysis of operations throughout the license application because these activities are an integral part of the operation of an ISL facility. Are there specific ecology impacts from drilling operations that NRC needs additional information?*

On May 22, NRC provided the following response: *The issue was not addressed in Section 4. There is only discussion of the total amount of surface disturbance, but no specific discussion of disturbance from exploratory borings. Please provide the approximate number of exploratory or delineation borings completed (or to be drilled) and the anticipated ecological impacts associated with this activity.*

The clarification is correct in that Section 4 does not explicitly state that exploration and delineation boring is considered by EMC to be a part of the operational activities for the proposed project and the impacts associated with these activities are considered although they are not discussed in a separate analysis. The reason that drilling is considered as a part of operations is that it is a long term activity that is the first step in the phased development of an ISL mine. In addition, delineation and exploration boring impacts a very small area for a very short period of time. Impacts include the excavation of a drill pit (which is generally backfilled within a week) and some soils and vegetation impacts from overland travel to the drill site by the rig and support vehicles. Following drilling, the hole is either plugged or cased as a well, the pit is filled, and the impacted area is revegetated.

The more significant impacts during operations are related to the subsequent installation and operation of wellfields. These activities involve the excavation of trenches for trunk lines and utilities to each well site, installation of power and headerhouses, construction of roads, etc. The impacts of these activities during operations are more significant and longer lasting than the impacts associated with drilling.

Due to the fact that drilling is closely related to a follow-on activity that has more significant impacts, we are having some difficulty in determining the best response to this question. We can describe the impacts on ecology from drilling as a subset of operations but frankly they are insignificant when compared to the other impacts associated with the operations phase. We could provide an expanded discussion of the methodology used to conduct exploratory or delineation drilling in the Alternatives portion of the ER that would allow a reviewer to understand the phased nature of development and the minor impacts from the drilling activity.

Please provide direction on how NRC would prefer that we respond to this question. Thanks Behram.

Best Regards,

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(148.184.100.43) with Microsoft SMTP Server id 8.1.358.0; Mon, 6 Jul 2009
12:12:15 -0400

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ESMTP; 06 Jul 2009 12:12:14 -0400

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srv-den-mx-01.den.u1.internal ([10.10.130.10]) with mapi; Mon, 6 Jul 2009
10:12:13 -0600

From: "Mike Griffin (USA)" <Mike.Griffin@uranium1.com>

To: "Behram Shroff (Behram.Shroff@nrc.gov)" <Behram.Shroff@nrc.gov>

CC: Mike Fliegel <myron.fliegel@nrc.gov>, "Jon Winter (USA)"

<Jon.Winter@uranium1.com>

Date: Mon, 6 Jul 2009 10:12:00 -0600

Subject: FW: Request for clarification of ER RAI question

Thread-Topic: Request for clarification of ER RAI question

Thread-Index: Acn0QFh9SNlzpQrHTY2w9Rz3oQyO9AKE7GtA

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Return-Path: Mike.Griffin@uranium1.com