Meeting Between BLM HQs and NRC
October 21, 2008

Purpose of Meeting

- Review feedback from BLM offices

Summary of Meetings with NRC and Wyoming BLM Field Offices (Week of September 21, 2008)

Buffalo (23rd) – POC (Paul Beels)

- Suggested a cooperation model that relies on a focal point at the State BLM Office
- Suggested considering the 2003 programmatic EIS for oil and gas exploration and their RMP when developing site-specific EAs
- Working on a PA under Section 106 (NHPA) for the Pumpkin Buttes area
- Land owner agreements, particularly if split-estate, could be problematic
- Will comment on the DGEIS if an extension is granted
- BLM owns 10 percent of surface land and 60 percent of the sub-surface minerals in the Buffalo region

Lander (24th) – POC (Jon Kaminsky)

- Interested in sharing information with NRC to support site-specific EAs
- Use RMP for cumulative effects analysis
- Suggested NRC work directly with Lander Field Office, not with State Coordinator
- Requested notification as soon as a license application for an ISL is docketed
- Lander Field Office will share information with NRC (along with WY DEQ) on site-specific EAs
- Requested a list of POCs (with phone #s) on all anticipated ISL applications
- Lander Field Office will comment on the DGEIS

Rawlins (25th) – POC (Mark Newman)

- Recommended an MOU between the NRC and BLM be developed, laying out roles and responsibilities, and signed by the State Office
- Rawlins would be responsible for the Lost Creek ISL (lies close to the Lander Office boundary)
- BLM issues Plans of Operation for developments on BLM land greater than 5 acres
- Plans of Operation require EAs
- Rawlins is interested in cooperation with the NRC to develop one encompassing EA, rather than two separate EAs, which may confuse the applicant

- No conventional uranium mills are currently proposed in the Rawlins area
- Ozone is nearing the NAAQS for WY (DEQ has primacy)
- DEQ requires restoration of GW (after ISL activities) to baseline. If baseline cannot be achieved then facilities can restore to class-of-use
- Rawlins Field Office will comment on the DGEIS

Wildhorse Energy has Conv. Mill: ISL planned. No LOI

Casper (25th) – POC (Tom Foertsen)

- BLM has a discretionary 30-day public scoping period and a required 30-day period for draft EAs
- In the past, there have been breakdowns in communications with the NRC on land issues
- The State BLM NEPA Coordinator is Ken Peacock
- Requested coordination with NRC on ISL applications
- Want to be aware of new ISL applications as soon as docketed
- Want to know the NRC POCs and schedules for each new application
- Want to work with the NRC to develop (jointly) an EA outline
- Want to set up regular communications between NRC PMs and BLM POCs
- Casper will submit comment on the DGEIS

- Discuss BLM jurisdiction
  - Plans of Operation
  - NRC Environmental Review
- Discuss NRC jurisdiction
  - License applications
  - NRC Environmental Review
  - Early site work – exemption requests
- Discuss options for formalizing cooperation between RNC and BLM
  - NRC → BLM Headquarters
  - NRC → BLM Wyoming Office
  - NRC → BLM Field Office
  - Agree on option for cooperation
- Discuss Rules of Engagement in Interim

Proposed Rules of Engagement
For BLM and NRC Cooperation on New ISL Uranium Applications
(Interim Guidance)

1. POCs be established for overall agency coordination
2. PMs (at NRC HQ and BLM Field Office) be established for each site-specific ISL application
3. New application packages to be shared with appropriate BLM Field Office
4. Kickoff meeting with PMs take place (via telcon or face-to-face)
5. PMs to develop outline for site-specific EA
6. PMs to develop schedule for completion of integral sections of EA
7. PMs develop RAIs for submittal to applicant
8. PMs coordinate data gathering
9. PMs review each other's sections for consistency
10. PMs coordinate with HQ POCs
11. HQ POCs ensure consistency in approach taken by each office