

Telecom Regarding ISL Uranium Recovery EAs

Date: 12/09/2008

Time: 4:00 pm

Participants: Mitchell Leverette, BLM-HQ
Roger Haskins, BLM-HQ
Patrice Bubar, NRC
Joan Olmstead, NRC
Gregory Suber, NRC
Alan Bjornsen, NRC

Subject: To Discuss Draft MOU Between NRC and BLM

- BLM-HQ has no major issues with NRC draft MOU, as submitted (participants believed we are '90 percent there)
- BLM legal department will look at it next
- Two issues need a closer look: 1) roles and responsibilities, and 2) lead agency status
- BLM field offices do 90+ percent of the work on proposed actions (HQ & State offices are little involved)
- BLM Director (a political appointee) will need to sign MOU (although an Acting Director has full authority to sign)
- BLM currently has an MOU with WY DEQ regarding surface mining activities
- WY DEQ is also requesting a joint MOU with NRC and BLM
- Regarding BLM's Plans of Operations:
 - It is a federal authorization (an order to proceed)
 - It is a functional equivalent of a permit
 - Requires an EA
 - Not issued until the following are granted
 - Mined Land Permit
 - Clean Water Permit
 - Clean Air Permit

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