

EagleRockCEM Resource

From: Linda Martin [linda@growidahofalls.org]
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To: EagleRockEIS Resource
Subject: RE NUREG-1945 August 9, 2010 Hearing in Boise, ID
Attachments: GIF NRC support ltr 8.9.10.doc

Grow Idaho Falls, Inc.

YOUR LINK BETWEEN BUSINESS AND OPPORTUNITY

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August 9, 2010

NRC Hearing, Oxford Suites Boise, Boise, ID
(Verbal remarks truncated at hearing; Full text below to be sent via email)

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop TWB-05-B01
U.S. Nuclear Regulatory Commission
Washington DC, 20555-0001

RE: NUREG-1945

Dear NRC Staff:

We are the economic development agency for Bonneville County, the City of Idaho Falls, and the City of Ammon, ID. We are a public-private non-profit entity representing a cross-section of businesses engaged in promoting and enhancing new and existing businesses in our community. This would include the EREF, and we are also home to the Center for Advanced Energy Studies, and hope to soon have the largest wind farm in Idaho.

We wish to comment on the AREVA/EREF application. The Draft EIS evaluates potential environmental impacts of the project. Based on the Council on Environmental Quality's regulations, each impact is assigned one of the following significance levels: small, moderate, and large.

In the Draft EIS, the majority of NRC impact assessments for the following topics is considered to be **small**, and is defined as *not detectable or so minor*, that they would *neither destabilize or noticeably alter* an important attribute of the resource:

- Land Use
- Geology & Soils
- Water Resources
- Public & Occupational Health
- Waste Management
- Socioeconomics – please note earlier verbal testimony of Tim Solomon and Lane Packwood
- Environmental Justice

The following topics were assessed by the NRC as being ***small to moderate***, with moderate as being defined as sufficient to noticeably alter, but *not destabilize* important attributes of the resource:

- Historical & Cultural Resources
- Visual & Scenic Resources
- Ecological Resources
- Transportation – we have encouraged the ID Department of Transportation to make road improvements on Highway 20 west of Idaho Falls to potential increased local traffic density now and in the future to accommodate through traffic to INL, Sun Valley, Boise, and other tourist locations in our region.
- Accidents

In the NRC assessment, the only topic which was described as ***small to large*** concerns the subject of Air Quality. In this geographic region local, state, and regional governments, agricultural interests, and private landowners frequently encounter dust or “fugitive” dust when working on projects concerning the land. Therefore, these impacts would be and should be considered to be normal, temporary, and brief in duration.

Economic Impacts

There are NO Idaho taxes directly going to support the construction of this facility. As a group which encouraged the grassroots statewide support of the legislation, it should be noted that it not only applies to AREVA, but to any other new capital investment of similar magnitude. These are ***earned*** benefits to companies choosing to invest in Idaho. The DOE issued a federal loan guarantee – not a federal loan. This was based on technical ability and financial credit worthiness from AES, and American corporation.

The Regional Development Alliance conducted an IMPLAN economic impact study regarding AREVA’s Eagle Rock Enrichment Facility decision to locate in eastern Idaho. The combined phases, for the purposes of this analysis, are expected to cover a multi-year period (30-35 years) across three phases of development (design, construction, operation) and would number in excess of \$5 Billion in total output.

The positive local impact of diversifying the tax base in Bonneville County, is significant. Whereas the current annual tax rolls may reflect an annual property tax income of a few hundred dollars, the Eagle Rock Enrichment Facility would bring in approximately \$4 Million.

As an economic development agency, we are already receiving inquiries from companies interested in this project, seeking to open new offices, and train and hire new employees. This is a great thing for the economic health of our community, and the state of Idaho. We are looking forward to the thousands of jobs during the various phases of the project. And while all human jobs and endeavors are subject to risk, this risk is outweighed by the benefits of the project.

Quoting previous testimony in December, 2008 from Rich Cartney “We don’t need a bailout, we need AREVA!”

Technical Impacts

The company's use of centrifuge technology is a proven, safe method of enriching uranium. This technology is more energy efficient, more environmentally friendly and less expensive to operate than the other accepted uranium enrichment process called gaseous diffusion.

In its application, AREVA has proven itself to be technically capable of addressing and satisfying any NRC criteria or requirements, as well as addressing any waste issues per DOE and NRC guidelines, which may be necessary for the full and successful operation of this plant.

Conceivably there is a significant gap in the supply/demand equation for enriched uranium to provide for our current and future green energy needs. The uncertainty of the future supply of energy could evolve into a national security issue. The Eagle Rock Enrichment Facility would be a principal supplier for this valuable and needed material.

In addition, there is NO evidence of any danger or threat of nuclear proliferation from the design, construction, or operation of the proposed facility.

And finally, these hearings are to discuss the appropriate scope and content of the economic, environmental, and safety reviews.

Stakeholders that reside in the immediate vicinity of the facility are the appropriate people to comment on these reviews. As residents, voters, and taxpayers, we locally represent the immediate concerns for impacts to our community. We appeared to provide public input in December 2008, and June 2009, today and again later this week. We will appear whenever the NRC asks for public input.

We appreciate the time and expertise the NRC has devoted to this licensing and permitting process. We hope that your studies and deliberations will continue to rely on scientific fact, and technology for a timely and positive outcome for our community and Idaho.

Sincerely,

Linda K. Martin
CEO, CEcD