

EagleRockCEm Resource

From: Caroline Morris [fleursmorris@gmail.com]
Sent: Monday, September 13, 2010 12:26 PM
To: EagleRockEIS Resource
Cc: Diane Jones
Subject: NUREG-1945 draft

Greetings NRC:

My comments follow about the draft Environmental Impact Statement (EIS) for the proposed Eagle Rock Enrichment Facility ((EREF) in eastern Idaho (NUREG-1945 draft).

The EREF is unnecessary, presents risks to Idaho's natural resources and people, and should not be licensed. **I oppose the EREF's licensing**

The possibility of NRC's allowing the contractor Areva to begin "preconstruction" activity in October 2010 troubles me, because it would predate release of this license's Record of Decision. Clearly, preconstruction is one part of this major federal action. 40 CFR 1500.1(b) requires agencies to release available information before making the pertinent decisions or taking relevant actions. This draft EIS must evaluate the preconstruction impact factors, since there is no time to initiate another EIS to consider preconstruction.

The draft EIS also may not comply with the Federal Farmland Protection Act (Act), which applies because Areva has a \$2 billion federal loan guarantee from the Department of Energy. The EIS claim of being exempt from the Act because the EREF site is on private property is wrong. Areva's licensing must comply with the Act and its procedural requirements before licensing.

The draft EIS too asserts without proof a greater need for domestically produced enriched uranium, Yet the document then contradicts the claim by these factors showing no need for the EREF: 1) the enormous expense and delays of the US nuclear renaissance, 2) decades of adequate fuel supply for currently operating the US reactors, and 3) creating an excess supply of enriched uranium by thelicensing this proposed facility. Since the only justification given for EREF, the asserted, unsupported need for more domestically produced enriched uranium, is fallacious, **a "no action" alternative should be chosen.**

Additionally, Areva's palm-greasing tactics to persuade officials to welcome the EREF, as the Mayor of Idaho City testified at the August Boise hearing, are pure bribery. Likely many other Idaho officials and citizens received other valuable favors from Areva, not publicly announced. Please refer to my letter to the editor published in the Idaho Stateman. (I am traveling and cannot access its late August or early September printing date.)

Please consider my concerns and adjust the draft EIS, or deny the license.

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