

9/30/2011

76 FR 60941

RULES AND DIRECTIVES  
BRANCH

November 15, 2011

⑥

NOV 16 AM 7:54

Ms. Cindy Bladey, Chief  
Rules and Announcements and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

RECEIVED

**Subject: Docket ID: NRC-2011-0217, Policy Regarding Submittal of Amendments for Processing of Equivalent Feed at Licensed Uranium Recovery Facilities**

Please accept my personal comments on the proposed RIS for Equivalent Feed. Please note that these comments do not necessarily reflect the position of my former employer, the Colorado Department of Public Health & Environment, nor my new employer, the U.S. Environmental Protection Agency. Time did not allow for circulation or vetting of my comments, and as such, are mine alone.

1. I concur with the position taken in the FR Notice relative to uranium-bearing resins from treatment of drinking water and mine waters being physically and chemically similar to resins from ISL operations. These materials contain significant amounts of source material, and cannot contain other hazardous materials (resins are specific), so there should be no issue relative to RCRA or sham recycling.
2. While this relief for the uranium mills is welcome, in practice it may not be economic for a uranium recovery facility to sign and maintain contracts with individual water districts due to the small volume of uranium vs. the needed administration and documentation needs. Perhaps the RIS should be expanded to provide guidance for waste handlers or waste brokers who may serve as middle men between the smaller water utilities and the uranium recovery facilities.
3. It should be made clear that the RIS is specific to ion exchange circuits at in-situ and conventional facilities so as to not expand to other processes under the rubric of physically and chemically similar.

Thank you,

Philip Egidi  
27921 North Rd.  
Hotchkiss, CO 81419  
pegidi@tenorm.com

SUNDI Review Complete  
Template = ADM-013

E-RIS = ADM-03  
Add: T. Carter (THC1)