

# PUBLIC SUBMISSION

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Supplemental Environmental Impact Statement for Proposed Dewey-Burdock In-Situ Uranium Recovery Project

**Comment On:** NRC-2012-0277-0001

Supplemental Environmental Impact Statement for Proposed Dewey-Burdock In-Situ Uranium Recovery Project in Custer and Fall River Counties, SD

**Document:** NRC-2012-0277-DRAFT-0065

Comment on FR Doc # 2012-28425

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## Submitter Information

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11/26/2012  
77 FR 70486

## General Comment

See attached file(s)

## Attachments

Scoping comment on Docket NRC-2012-0277 Powertech

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**SUNSI Review Complete**

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**Add= H. Yizma (hxy1)**

January 8, 2013

Cindy Bladey, Chief, Rules, Announcements and Directives Branch  
Division of Administrative Services  
Office of Administration, Mailstop TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

RE: Public comments for proposed Dewey-Burdock project Docket NRC-2012-0277

Thank you for the opportunity to submit comments concerning the scope of NRC's SEIS for the Dewey-Burdock project. I appreciate the opportunity to have my voice heard, and hope that the NRC will listen to public comments, take them seriously, and apply the requests to the SEIS. I would like to add, however, that the timing of the public comment period was certainly not in the best interest of public participation, falling through the holidays as it has.

I have been researching the impacts of in-situ leach (ISL) uranium operations since fall of 2007 and have grave concerns about the ISL process in general. There are numerous major problems with past and existing ISL sites throughout the US, including the presence of contamination pathways caused by improperly abandoned drill holes, the excessive number of leaks, spills, and excursions of contaminated injection and production fluids at existing ISL mines, the inability of ISL operators to restore groundwater to pre-mining conditions, the inability to stop the leaching process after decommissioning, and the temporary and permanent impacts to land resources and surrounding land owners.

As far as the potential for negative impacts to the Dewey-Burdock project area specifically, I feel the SEIS for Powertech's proposed project should carefully review all of the potential negative impacts to the specific project area, including (but not limited to) the following:

- There is a potential impact for aquifer depletion, due to the extremely high consumptive use of water during the ISL processing and restoration phases, which has the potential to draw down the aquifers. The 3% water waste that industry states amounts to millions of gallons of water per year for the planned duration of the project. The restoration phase is even more consumptive, and can amount to billions of gallons of water wasted per year. This highly consumptive use of water has a potential to drop the mined aquifer, which in turn could also deplete the aquifers above it. The loss of water for domestic and stock use could have extreme negative impacts for local landowners, especially since they have been in a major drought which is still continuing.
- There is a potential impact for aquifer contamination to continue for decades, as current ISL sites have not been able to restore the aquifers to pre-mining condition. Elevated levels of arsenic, molybdenum, selenium, vanadium, and uranium are often present at higher levels than baseline even after groundwater restoration. Additionally because of the mining solution, elevated levels of sodium, carbonate, or sulfate are present. Mining may also increase total dissolved solids and change pH levels. Some have been unable to stop the oxidation process at all, even after the aquifer has been considered "restored".

Powertech does not propose any new methods for restoration, so the impact from this issue could be extremely grave.

- There is a potential impact to land surface that will in turn negatively affect the wildlife of the area. The potential impact for contamination of surface water should be carefully researched and reviewed, as this area is a major habitat for many threatened or endangered wildlife species, such as Bald Eagles, Whooping cranes, Sage-grouse and Black-footed ferrets. In addition, there are numerous species of more common wildlife that will all be negatively affected by surface contamination of their drinking water.
- The SEIS states numerous times throughout, that impacts are “small”. These impacts may be small in the overall picture, but the impacts can be devastatingly large to the actual area impacted. Often the reason for considering the impacts “small” is based solely on what Powertech says they will do in various situations. First of all, they have never developed or run and ISL uranium process, so we have no past history to prove that they can do what they say they will do. Secondly, many of the things they say they will do have already been proven by other ISL sites that they simply cannot be done; such as the water restoration.
- I feel that if Powertech is allowed to move forward with this project, then the future will prove that every impact they had on the area turned out to be large, if not catastrophic.

Thank you for your time and consideration of these comments.

Sincerely,

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