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Strata Energy, Inc., Ross In-Situ Uranium Recovery Project, Crook County, Wyoming; Notice of Materials License Application, Opportunity to Request a Hearing and to Petition for Leave to Intervene, and Commission Order Imposing Procedures for Access to Sensitive Unclassified Non-Safeguards Information for Contention Preparation

Comment On: NRC-2011-0148-0007

Supplemental Environmental Impact Statement for the Ross In-Situ Uranium Recovery Project in Crook County, Wyoming

Document: NRC-2011-0148-DRAFT-0019

Comment on FR Doc # 2013-07332

Submitter Information**Name:** Oshoto Landowners**Address:**

3005 New Haven Rd

Oshoto, WY, 82721

Organization: Oshoto Landowners

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RULES AND DIRECTIVES
BRANCH
USNRC**General Comment**

See attached file(s)

Attachments

Signed NRC Comment Document

SUNSI Review Complete**Template = ADM - 013****E-RIDS= ADM-03****Add= J. Moore (Sam 7)**

Cindy Bladey, Chief
Rules, Announcements, and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop: TWB-05-B10M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Docket # 2011-0148

To whom it may concern:

This letter is to address the concerns of the landowners and local community members pertaining to the Environmental Impact Statement for the Ross ISR Project in Crook County, Wyoming. NUREG-1910, supplement 5

We have identified the following concerns that we believe must have a clear and DETAILED plan in the SEIS. (1) Potential Contamination of Local Aquifers, (2) Increased Traffic on County Roads, (3) Air and Noise Pollution, (4) Emergency Management Co-ordination with County, (6) Unrealistic Options.

(1) Potential Contamination of Local Aquifers

EIS Section 4.5: Water Resources

During the 1970's Nuclear Dynamics drilled into the same aquifer that Strata is proposing to mine from. When they discontinued the mining and left they did not properly seal all their drill holes. Strata has not been able to find and properly seal these OPEN holes; even Strata employees have stated that they are unable to locate some of these holes. As we understand it, Strata has only been able to locate less than half of the old drill holes from the 1970's. The landowners have indicated having problems with Strata keeping proper records of the holes they are drilling for exploration let alone tracking and finding exploration holes drilled some 40 years earlier. If Strata starts mining and injects their "lixiviant" under pressure in to the ore-zone aquifer there is a great possibility that their lixiviant will travel out of the ore-zone aquifer and into the surrounding aquifers contaminating them. These surrounding aquifers are the life blood of our community.

We recommend that Strata be required to locate and properly seal the holes left by Nuclear Dynamics along with the exploration holes drilled by Strata and verified by an independent third party before obtaining a permit from the NRC. We also recommend that a detailed plan of supplying water to the local community be prepared identifying the quality, quantity, and timely manner of delivery of water in the event of an aquifer contamination.

(2) Increased Traffic on County Roads

EIS Section 4.3: Transportation

County road use is expected to increase 400% during construction. The New Haven Rd. and (D) Rd. South of the proposed CPP location along with the Cabin Creek Rd. East of the proposed CPP cannot handle this kind of traffic. The mitigation listed would require more county involvement than Strata involvement. When talking to a county commissioner (4/29/13) Strata is falling short of getting a detailed plan on road construction and maintenance with the county.

We ask that Strata submit a detailed plan to the county road and bridge along with monetary payment, to address the safety concerns associated with large volumes of traffic and poor existing roads to the proposed CPP location. We also request that the NRC require Strata to submit a detailed plan for the CPP location.

(3) Air and Noise Pollution

EIS Section 4.7 & 4.8: Air Quality and Noise

Specifically 4.7.1.1 States that "Traffic associated with the Ross Project would use the primary access route of New Haven Road or D Road, which are paved, such that impacts, including fugitive dust generation, would be limited to more occasional access on local dirt roads within the Ross Project area." This is an out and out lie as there is no pavement within 15 miles of the Proposed CPP Location. The D Road and the New Haven Road are shale based roads, which, in their current state, are very hard to manage any dust controls.

Strata has proposed many mitigation measures to attempt to moderate air, noise and light pollution. Our concern as the community members that will be directly affected, including the nearest residents to the CPP, is the enforcement of these mitigation measures. For example, they state that one way they can address air pollution is by implementing and enforcing lower speed limits, and they state that many of their construction activities and deliveries would happen during daylight hours, not 24 hours per day. We would like to know how these proposed mitigation measures will be enforced so that Strata follows them once the permit is issued.

(4) Emergency Management Co-ordination with County

EIS Section 4.11: Socioeconomic ~ Health and Social Services

Strata states that they anticipate only a .1 percent increase in the local population, therefore they anticipate only a .1 percent increase in the demand for health and social services. We feel that this statement well under-represents the true impact on local emergency services. With the increase in the workforce, the far distance of travel on two-lane gravel roads, the extreme drought conditions of the state, and the amount of activity of drill rigs and construction work in vegetated areas, we believe the potential for accidents and fires is extremely HIGH compared to the current state of the community prior to Strata's mining operations. The county is manned entirely by all-volunteer fire fighters. We would propose that Strata be required to not only have trained emergency-response personnel on staff, and not only work with local responders as how to proceed with preparing and responding to potential environmental, safety and health emergencies, but they also be required to have a fire fighting unit available and staff trained to respond at all times. Wildfires in this area can get out of control very quickly, and due to our lengthy distance from any town, we as the community must be able to respond quickly.

(5) Unrealistic Options

EIS Section 4: Environmental Impacts and Mitigation Measures

Strata presents Alternative 1: Proposed Ross Project, Alternative 2: No Action and Alternative 3: North Ross Project for each mitigation measure. The landowner that owns the property where the North Ross Project is proposed has made it clear to Strata that there is no possibility for purchasing that land, therefore, they really only have two Alternatives that are relevant, the Proposed Ross Project Alternative and the No Action Alternative.

In conclusion, we would like to encourage the NRC not to rely only on the general EIS when fully analyzing the impacts of Strata's project. We feel that the NRC needs to fully consider the cumulative impacts to water quality and quantity from the full scope of Strata's entire project, to include not only the first permitted site of the Ross Project, but the four additional projects within the twenty mile area of the Lance District within Crook County. We hope that the NRC also would require Strata to expand on their conservation efforts to minimize impacts to livestock grazing, recreation, and wildlife in connection with these cumulative impacts.

Respectfully Submitted,

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Concerned Community Members, Residents and Landowners of Oshoto, WY