

RULES AND DIRECTIVES
BRANCH
USNRC

As of: May 14, 2013
Received: May 13, 2013
Status: Pending Post
Tracking No. 1jx-85b2-4k4j
Comments Due: May 13, 2013
Submission Type: Web

PUBLIC SUBMISSION

2013 MAY 14 AM 11: 03

RECEIVED

Docket: NRC-2011-0148

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-0031

Comment on FR Doc # 2013-07332

3/29/2013

78 FR 19330

Submitter Information



Name: Pamela Viviano

Address:

735 New Havne Road
Hulett, WY, 82720

General Comment

See attached file(s)

Attachments

Final draft - comments to NRC-Ross ISL site - May 13, 2013

SUNSI Review Complete

Template = ADM - 013

E-RIDS= ADM-03

Add= J. W. W. (Jan 7)

May 12, 2013

Cindy Bladey
Chief Rules, Announcements and Directives Branch
Division of Administrative Services
Office of Administration
Mail Stop TWB-05-B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Docket ID NRC-2011-0148

Thank you for the opportunity to comment on the Strata Energy Ross project Draft Supplemental Environmental Impact Statement. I live close to the Ross site, and am extremely concerned about the potential negative impacts from the in-situ leach (ISL) uranium site that is proposed for our county. I have been studying and researching the ISL process and the history of violations and issues revolving around this process for over five years. My research gives me much to be concerned about, in regards to Strata Energy's proposed ISL project and its probable impacts to our land, water, air, and other interests.

To begin with, I feel it is extremely unfortunate that the Draft EIS for the Strata uranium project relies so heavily on the Generic EIS that I strongly opposed in 2009. I felt at the time that tiering off of the GEIS was simply a way to "streamline" NRC permitting and speed up the review process, and it appears that this is exactly what it has done. The Draft EIS shows that the GEIS was simply a way to *shortcut the research process and prevent careful analysis of localized impacts*. In its Draft EIS for the Strata project, I feel that the NRC has greatly simplified the analysis of impacts to water, land, air, public health and safety, and wildlife from uranium mining in Crook County.

The Draft EIS does not resolve the concern regarding the risk of fluid migration. The Draft EIS does not fully consider that the proposed uranium mining area has over 5,000 abandoned drill holes from the early days of uranium exploration. According to NRC's draft EIS, Strata Energy knows that there are at least 1,682 old exploration wells in the area, but the company has only located less than half of them. NRC's draft EIS acknowledges that water contamination could result from "improperly plugged previous exploration drill holes that have not yet been properly abandoned," but then illogically assumes that impacts to water resources will be "small." I feel that the agency glosses over this problem and ignores the risk that these drill holes represent. This issue needs much more analysis and research, in order to prove that the ore body in which Strata will be working is in fact, a "confined aquifer".

The proposed ISL process has an extremely high consumptive use of water, during the ISL processing and restoration phases, which have the potential to draw down the aquifers that provide drinking water and water for livestock. Industry often states that during the processing phase, the waste water is only 3% of the water used. However, this amounts to millions of gallons of water per year for the planned duration of up to 20 years. At one meeting with Strata Energy, they stated that "the water consumption for the processing phase is minimal, compared to the restoration phase." This is something that I had already learned in my research; that the restoration phase is even more

consumptive, as the initial phase uses a method termed "groundwater sweep" and then continues with another process called "reverse osmosis." As I understand it, significant amounts of water are used. I have reviewed reports that show that one site currently is in its 9th year of attempting to restore the water for a site that was originally estimated to take less than 2 years in the restoration phase. I'm concerned because Strata Energy's process will be the same as these other companies. Therefore, we expect that the water waste for this phase can be in the billions of gallons, over these long periods of time. The Draft EIS does not fully consider that precipitation levels are changing, and in the past two years, this area has moved into a serious drought. Many stock ponds and ground water aquifers are already dropping, and landowners are having to drill deeper to find adequate sources of water. The Final EIS needs to take into account current climate conditions, and the Large negative impact that this process could have on the area ground water

Another potential negative impact that is down-played in the Draft EIS is that groundwater restoration remains difficult and has taken longer than expected at operating mines in Wyoming. To date there is no example of an aquifer being returned to pre-mining conditions at a commercial-scale ISL uranium mining operation. I have reviewed documents that show that at one site in Wyoming a reported restoration value of uranium for one wellfield was 70 times the baseline value. Based on what I have seen, I believe that restoration of the water for all parameters has proven impossible. The elements that ISL operators have been unable to return to baseline are the ones that are of the most concern to me as a landowner who uses the local water supply, including a mix of radioactive and toxic heavy metals such as uranium, arsenic, and radium-226. The past history of ISL sites and their failure to restore aquifers to pre-mining conditions – even after years of trying – demonstrates the need for the NRC to consider effective mitigation measures. Rather than allowing new sites to move forward, the NRC should consider license requirements that would prevent bringing new ISL sites into production until restoration is achieved at current operations.

Another problem with the NRC's draft EIS is that it doesn't consider the cumulative impacts to water quality and quantity from the full scope of Strata's whole project, which includes the first permitted site (Ross Project) with an anticipated four additional projects in an approximately twenty mile long area, called the "Lance District" in Crook County. NRC is required to look at cumulative impacts in its EIS to properly assess the combined impacts of the analyzed project with other past, present, and future projects in the area. All of these projects will be connected to this initial permit so NRC needs to consider their impacts in its EIS. It appears that NRC's EIS does not fulfill this requirement.

In conclusion, I must say that as I read through this extensive document, it became apparent that throughout its entirety, many of the impacts were considered to be MODERATE to LARGE; but then they could all be simply "swept under the rug" with the universal cover of "Best Management Practices". It is strictly "assumed" that everything will be done right, and few problems will arise, and when they do...Strata will immediately remedy them. NRC must realize by now that the so-called Best Management Practices are not working and new practices need to be developed that will work. **If a new set of management practices cannot be developed that will actually protect the public and the environment, then new licenses for ISL sites should not, in good conscience, be issued.**

Pam Viviano