

PUBLIC SUBMISSION

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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-0037
Comment on FR Doc # 2013-07332

3/29/2013
48 FR 19330
34

Submitter Information

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Organization: Prairie Hills Audubon Society

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RULES AND DIRECTIVES
BRANCH
USNRC

General Comment

Nancy Hilding
President
Prairie Hills Audubon Society,

We are opposed to this project.
We attach our comments as both a PDF and a MSW file from a MacIntosh (same text, different formats).

Thanks,

Nancy
See attached file(s)

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

Attachments

PHAS.Ross.comments

PHAS.Ross.comments

Nancy Hilding
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May 13, 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

Dear Ms Bladey,

Comments on the Supplemental Environmental Impact Statement for the Ross In-Situ Leach Uranium Mining Project in Crook County, Wyoming

Waste as connected action.

We request that the SEIS specifically discuss the storage of the nuclear waste, both high and low level issues that will arise from the production and utilization of this uranium. We request you not just limit discussion to the waste generated specifically at this facility, but to the waste generated from transportation to and use at the remote facilities to which the uranium is shipped, stored and used. We request that this future storage of radioactive wastes generated by the future use of the uranium, be considered a connected action. We request that you discuss specifically where and how it will likely be stored, how much the storage of the radioactive waste, derived from use of the Uranium mined by Ross, will cost the tax payers; how much to store it per year and for how many years? We don't want vague tiering to the GEIS, but a specific disclosure of the environmental risk and the cost in public dollars, of handling the share of the national and international waste problem generated by this facility.

Military Applications as connected action.

Please discuss the percentage use of uranium mined in the world that is used for military applications, both for missile warheads and depleted uranium for military devices. Please disclose what the percent of the worlds uranium supply will be made available by Ross. What percentage share of the world's uranium production/stores used for military applications, could theoretically be attributed to Ross if all of Ross's produced uranium is used for military uses and if none is used for military uses: give us a range of percent.

Please discuss the health and environmental effects from depleted uranium to conflict and war impacted and ravaged areas.

While Rosses uranium may not be used specifically for military uses, the fact that it will exist will allow other uranium supplies to be used for war rather than electricity. Please discuss the risk of nuclear war and nuclear winter and environmental impacts from both. Please consider the supply of uranium for military purpose and the devastation that creates, or at least Ross's share of the world military supply, a connected action.

Tiering to the GEIS,

The GEIS was a very poor and inadequate document. We object to tiering to the GEIS, to escape discussion of issues and impacts in this SEIS.

Native American Concerns

Please give full consideration and respect to concerns raised by Native Americans. We believe "Devils Tower" is sacred to them. Special attention should be paid to Native American treaty issues, cultural, historic, sacred and religious issues. Please consider this as an environmental justice issue, due to Devils Tower.

OTHER POINTS YOU MAY NOT HAVE HEARD COMMENTS ON ELSEWHERE

- Fully disclose information about rare wildlife/fish on and near the site and transportation routes and any impacts to rare wildlife and fish predicted. Please discuss any rare or at-risk birds you have on or near sites and transportation routes and any impacts to them. Please adequately mitigate any impacts predicted to all of them.
- If water application to land is considered, please consider impacts to native plant and communities and any aquatic habitats including, wetlands and any other area of water saturated soils. Also consider bio-concentration of pollution in animals and any impacts to the food chain (weather human or animal).
- Fully disclose any rare plant communities or rare plants and fully disclose impacts to them. Please discuss any areas of virgin prairie that have never been plowed or otherwise disturbed. Please assure any planting is done with native seed and native trees or shrubs. Adequately minimize impacts to pristine plant communities, rare plants and rare plant communities.
- Please discuss any habitat fragmentation resulting from the project and provide adequate mitigation.
- If any polluted water will reach SD and/or Montana, discuss the water quality issues over the border and any assimilative capacity concerns.
- Fully discuss the visual quality of area, impacts to and provide adequate mitigation.


OTHER POINTS, you have likely heard before:

- 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 – 759. And out of that 759, they have successfully plugged only 55. That means there are over 1,600 old wells in the area that could serve as conduits for water contamination from Strata's project (and we know there are likely thousands more). NRC's draft EIS acknowledges that water contamination could result from "improperly plugged previous exploration drillholes that have not yet been properly abandoned," but then illogically assumes that impacts to water resources will be "small." NRC needs to do a better job at analyzing the risk that these old drillholes – both inside and immediately adjacent to Strata's project area – represent. **This potential for contamination could include the Madison aquifer, which supplies water to many municipalities in Wyoming, S. Dakota, and Montana.**

- Fully consider that the proposed ISL process has an extremely high consumptive use of water, which has the potential to draw down the aquifers that provide drinking water and water for livestock. **Again, this potential for aquifer depletion could include the Madison aquifer which supplies water to many municipalities in Wyoming, S. Dakota, and Montana.**
- Consider the track record of spills, excursions, pond leaks, and failed aquifer restoration at previous uranium mines in Wyoming, Nebraska, and Texas. Impacts of past uranium projects have been significant – with routine spills, leaks, and excursions of chemicals into adjacent aquifers. Some excursions have lasted over seven years. And, to date, not a single uranium project has fully restored an aquifer to pre-mining water quality. **There is no indication that Strata's operations will prevent these impacts, yet NRC ignores them in its draft EIS.**
- Consider the cumulative impacts to water quality and quantity from the full scope of Strata's whole project, which includes this first permitted site of the Ross Project with an anticipated four additional projects in an approximately twenty mile area called the "Lance District" in Crook County. **All of these projects will be connected to this initial permit so NRC needs to consider their impacts in its EIS.**
- Adequately minimize light pollution and other industrial impacts to landowners in the Oshoto area and to Devil's Tower National Monument.
- Adequately minimize impacts to livestock grazing, and recreation in the area.
- Minimize impacts from truck traffic, dust, and noise. Sincerely,

Nancy Hilding



President,
Prairie Hills Audubon Society