

From: sarah@uraniumwatch.org
Sent: Monday, November 04, 2013 9:28 PM
To: Mandeville, Douglas
Subject: [FWD: Licensing of Ablation in Wyoming and Other States]

Importance: High

Had your wrong e-mail address.

----- Original Message -----

Subject: Licensing of Ablation in Wyoming and Other States
From: <sarah@uraniumwatch.org>
Date: Mon, November 04, 2013 3:23 pm
To: Doug.Mandeville@nrc.gov
Cc: Bill.VonTill@nrc.gov, "Duncan White" <Duncan.White@nrc.gov>

Dear Mr. Mandeville,

I have some questions regarding the NRC's licensing of a proposed Wyoming Ablation test processing where "ore" will be processed by Black Range Minerals Ltd. and Ablation Technologies LLC in Wyoming. Recent information on the BRM website indicates that the company plans to process ore and produce a product of uranium (that is, source material) in licensable amounts. The company plans to process "ore" for its "source material" uranium content in a few weeks. That process will create a waste product, yet there is no satisfactory definition of that waste or a satisfactory waste disposal plan. Nor is there a surety, plans to protect the health and safety of the workers and the public, plans to protect the environment, or a NEPA review.

Yet, there is no evidence that the company planning this processing project has applied for and received a license from the NRC. Why, exactly, has this project been exempted from NRC Part 40 licensing? If it has not been exempted, when is the NRC going to take action? Is the NRC going to demand a license application after the fact? Why has the NRC not inspected this operation?

<http://www.blackrangeminerals.com/content/wp-content/uploads/2013/10/30-Oct-2013-Update-on-Commercialisation-of-Ablation-for-Recovery-of-Uranium-Mineralisation.pdf>

There is also the question as to whether this above-ground processing of ore primarily for its source material content constitutes uranium milling. Ablation licensing is still an unresolved issue. I do not see that the NRC has addressed the issues of of Black Range Minerals' plans to process stockpiled ore for its source material content in Colorado and Utah.

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The question of the processing of "ore" for its source material content via Ablation now involves operations or proposed operations in two states subject to NRC licensing (Wyoming and Arizona) and two NRC Agreement States (Utah and Colorado). There is no evidence of any NRC guidance on this issue or any NEPA analysis, specific regulations, or public review of any applicable guidance or regulations.

How long is the NRC going to delay a complete analysis of all aspects of Ablation technology and establish some kind of regulatory framework, with accompanying NEPA review and public input?

Sincerely,

Sarah Fields
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