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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF THE
GENERAL COUNSEL
RULEMAKING AND
ADJUDICATION STAFF

BEFORE THE PRESIDING OFFICER

In the Matter of)
) Docket No. 40-8968-ML
HYDRO RESOURCES, INC.)
2929 Coors Road, Suite 101) (Leach Mining and Milling License)
Albuquerque, New Mexico 87120)

NRC STAFF'S RESPONSE TO INTERVENORS'
PRESENTATIONS ON ENVIRONMENTAL JUSTICE ISSUES

INTRODUCTION

By submittal dated February 19, 1999, Intervenors Eastern Navajo Diné Against Uranium Mining (ENDAUM) and Southwest Research and Information Center (SRIC), jointly filed a written presentation on environmental justice issues.¹ In another joint filing also dated February 19, 1999, Intervenors Grace Sam and Marilyn Morris filed a written presentation discussing environmental justice (and other) issues.² ENDAUM, SRIC, Grace Sam, and Marilyn Morris (hereinafter referred to collectively as the Intervenors) filed their written presentations pursuant to 10 C.F.R. § 2.1233,

¹ This filing will be referred to as SRIC's Environmental Justice Brief. Attached thereto is the supporting testimony of Dr. Robert Bullard (Exhibit 1, hereinafter "Bullard Testimony," with Attachments A-M); Dr. Christine Benally (Exhibit 2, hereinafter "Benally Testimony," with Attachments A-V); Dr. Douglas Brugge (Exhibit 3, hereinafter "Brugge Testimony," with Attachments A-F); Mr. Larry King (Exhibit 4, hereinafter "King Testimony," with Attachments A-D); Mr. Mitchell Capitan (Exhibit 5, hereinafter "Capitan Testimony"); and Ms. Mavis Smith (Exhibit 6, hereinafter "Smith Testimony," with multiple survey forms referenced as "Exhibit A").

² See "Final Written Presentation Of Grace Sam and Marilyn Morris." The Staff herein responds to pages 4-14 (Section I) of this filing, which will be referred to as "Sam's Environmental Justice Brief." The Staff is responding to the remainder of the "Final Written Presentation Of Grace Sam and Marilyn Morris" in a separate filing.

the Presiding Officer's Memorandum and Order (Scheduling and Partial Grant of Motion for Bifurcation), dated September 22, 1998 (unpublished) (Scheduling and Bifurcation Order), as amended, and the subsequent Joint Notice of Modification of Schedule for Written Presentations dated November 5, 1998, as amended. The environmental justice briefs are among the last of a series of scheduled written presentations being filed on issues involving the proposed *in situ* leach (ISL) uranium mining by licensee Hydro Resources, Inc. (HRI).

Pursuant to the Scheduling and Bifurcation Order (as later modified by the Presiding Officer), HRI filed its environmental justice response to the ENDAUM and SRIC arguments on March 25, 1999 (HRI's Environmental Justice Response), and filed a separate response to Sam's Environmental Justice Brief on March 29, 1999. The Staff hereby submits a combined response to the environmental justice presentations.

As discussed below, the Intervenors' arguments on environmental justice issues lack legal merit, and the requests for relief (*see* SRIC's Environmental Justice Brief, at 39; and Sam's Environmental Justice Brief, at 31-32) should accordingly be denied.

BACKGROUND

In NUREG-1508, the Staff's February 1997 Final Environmental Impact Statement to Construct and Operate the Crownpoint Uranium Solution Mining Project, Crownpoint, New Mexico (FEIS), the Staff provided a full evaluation of HRI's proposed ISL mining operations, and included therein a thorough discussion of environmental justice issues. *See* FEIS §§ 3.10 (at pages 3-78 to 3-87), and 4.12 (at pages 4-112 to 4-120). In May, 1998, following issuance of HRI's license, the Presiding Officer ruled that concerns regarding existing radiological contamination in and around

HRI's Church Rock site are not germane to this proceeding. *See* LBP-98-9, 47 NRC 261, 283 (1998). The Scheduling and Bifurcation Order further narrowed the scope of issues now relevant to those regarding proposed operations at HRI's Church Rock Section 8 site,³ and the consequences of ISL mining on Section 8. *See* Scheduling and Bifurcation Order, at 3.⁴

Contrary to this limited scope, much of SRIC's Environmental Justice Brief, and its supporting testimony, discuss proposed ISL operations at HRI's Unit 1 or Crownpoint sites,⁵ and non-germane concerns regarding existing radiological contamination in and around HRI's Church

³ HRI's Church Rock Section 8 site is located about six and one-half miles north of the town of Church Rock. *See* Bullard Testimony, at 16-17.

⁴ In CLI-99-1, 49 NRC 1, 3-4 (1999), the Commission reinforced this limited scope by directing the Presiding Officer to "complete his series of merits decisions on all matters related to the Church Rock Section 8 property" by June 15, 1999.

⁵ *See, e.g.*, SRIC's Environmental Justice Brief, at 13 (quality of Crownpoint drinking water); *id.*, at 28-29, 33, and 38 (regarding the relocation of Crownpoint drinking water wells); and *id.*, at 30-31, and supporting testimony cited therein, regarding the relocation of residents, which would be necessary only at HRI's Unit 1 site. *See* FEIS page 4-118, referencing FEIS § 4.8, at page 4-94.

Rock site, and elsewhere.⁶ Similarly, much of Sam's Environmental Justice Brief concerns ISL mining-related impacts at HRI's Crownpoint site.⁷

The Staff's discussion in Section B, *infra*, regarding the legal merits of the environmental justice issues raised by the Intervenors, focuses on the germane concerns relevant to HRI's Church Rock site. Much of this discussion concerns topics previously addressed in the FEIS.

⁶ See, e.g., SRIC's Environmental Justice Brief, at 2 ("ongoing radiological contamination from the residue of years of uranium mining"); *id.*, at 12 ("Church Rock has an intensive history of past uranium mining and milling that has left a legacy of ongoing radiation exposures"); *id.*, at 21, and Benally Testimony cited therein (regarding uranium mining sites near HRI's Church Rock site, "from which tens of millions of [tons of] uranium ore were extracted from the late-1960's through the early-1980's"); SRIC's Environmental Justice Brief, Section E, at 31-32 (criticizing the FEIS discussion of the no-action alternative regarding "existing radiation levels"); *id.*, at 37-38, and Benally Testimony cited therein ("for a period of many years, residents of Church Rock have been exposed to unsafe levels of radiation caused by the historical uranium mining and milling activities in the area"); Benally Testimony, at 9 (regarding health risks "from chronic exposure to contaminants associated with *existing* environmental impacts of previous uranium mining"); *id.*, at 22-23 (regarding mortality rates of Navajo underground uranium miners); Brugge Testimony, at 4, and 12 (regarding wastes present at abandoned uranium mine sites near HRI's Church Rock site); *id.*, at 6-11 (regarding residual contamination levels in mill tailings from non-ISL uranium mines worked from the early 1940s to the mid 1960s in the King Tutt Mesa area, over 80 miles away from the Church Rock area).

⁷ See, e.g., Sam's Environmental Justice Brief, at 7, and 10-13 (regarding the relocation of Crownpoint drinking water wells); and *id.*, at 7, and 13-14 (regarding property values in the town of Crownpoint).

DISCUSSION

A. Objections To Expert Testimony Proffered By ENDAUM and SRIC

Before addressing the legal merits of the relevant environmental justice issues raised by the Intervenors, the Staff requests that the Presiding Officer decline to accept for consideration the Bullard, Benally, and Brugge testimonies proffered by ENDAUM and SRIC. Under the guise of expressing environmental justice concerns, ENDAUM and SRIC are improperly attempting, in an untimely fashion, to supplement the air emissions testimony of Bernd Franke,⁸ and to buttress previous arguments regarding groundwater issues. *See* Brugge Testimony, at 4-5, and 12-14. For these reasons, and for the reasons discussed below, the Bullard, Benally, and Brugge testimonies should not be considered in this proceeding.

1. Bullard Testimony

Dr. Bullard is a sociologist, and lacks the training necessary to offer educated opinions on the public health effects of radiological toxins. *See, e.g.*, Bullard Testimony, at 33 (Navajo population "more susceptible to the additive and perhaps synergistic effects of additional exposures to chemical and radiological toxins"); and 39-40 (FEIS mitigative measures will not effectively protect public health).

His lack of relevant expertise is evident in various places within his testimony. For example, in discussing the daily outdoor activities of local farmers and shepherds, he fails to explain why their health has apparently remained unaffected by the previous and quite extensive uranium mining in

⁸ This is obvious from the heavy reliance placed on Bernd Franke's report in the proffered testimonies. *See, e.g.*, Bullard Testimony, at 22, 27-29, 35, and 39; and Benally Testimony, at 7, Table 4 at 35, 36-39, and 43-44.

the area, or how the proposed ISL mining would adversely affect them. *See* Bullard Testimony, at 18-20, and 26. His opinions regarding an “at-risk population in the Church Rock area” (*id.*, at 30); and the “radon problem in the Church Rock area” (*id.*, at 30-31 n. 32); and local exposure “to unsafe levels of radiation” from past uranium mining (*id.*, at 44), in addition to being outside the scope of germane concerns, bear no relationship to his observations regarding the vigor with which the local farmers and shepherds lead their lives.⁹

Accordingly, the Presiding Officer should not accept Dr. Bullard’s testimony in this proceeding.¹⁰

2. Benally Testimony

Based on the description of her qualifications, Dr. Benally also lacks the training and experience necessary to offer an opinion on the local population’s susceptibility to impacts from new

⁹ The Benally Testimony, discussed *infra*, contains a similar defect. Dr. Benally discusses the water supplies used by the local residents in the Church Rock area (about half of such residents apparently do not have running water in their homes, and are thus forced to haul water), but fails to explain the good water quality despite the previous and quite extensive uranium mining in the area, or how the proposed ISL mining would adversely affect the local water supplies. *See* Benally Testimony, at 16 and n.16.

¹⁰ Should the Presiding Officer decide to the contrary, the Staff notes that with respect to the 173 residences depicted on Bullard Attachment L, none are shown to be in the top half of Section 9, and none are located in Section 4. These are the areas located to the north-northeast of HRI’s Section 8, towards which the prevailing winds blow, and the groundwater gradient flows. *See* FEIS, Figures 3.1 and 3.11. Dr. Bullard’s simplistic analysis incorrectly assumes that all surrounding residences would be equally impacted by ISL mining on Section 8. *See* Bullard Testimony, at 25.

radiation sources (*see* Benally Testimony, at 1-5, and 26¹¹), and to state that there is “evidence” (unspecified) that radon releases from HRI’s Church Rock ISL mine site will not be insignificant. *Id.*, at 27.

Similarly, Dr. Benally provides no evidence that she is qualified to use, or has ever used before, what she identifies as the Biological Impact Pathway Model (BIPM). *See generally* Benally Testimony, at 30-40. While the Staff is not familiar with the details of the BIPM,¹² it appears to be an ecological risk assessment model. According to Dr. Benally, BIPM was developed to measure exposure to indoor air pollutants, “but it can and has been adapted to population-level exposures in the ambient environment.” *Id.*, at 30. No evidence of such use is provided. She also states that, in preparing her Table 4 estimates of radiological contamination, she applied only “portions of the BIPM.” *Id.*, at 34. Based on the lack of any showing whether BIPM is a proper method to measure either outdoor gamma activity levels, or outdoor radon-222 levels, and the lack of any showing whether Dr. Benally is qualified to use BIPM, this BIPM testimony should not be accepted in this proceeding.

¹¹ Her stated opinion in this regard appears to be based on the presence of several factors impacting the health of the local population (*i.e.*, car accidents, cancers, infectious diseases, diarrhea, lack of running water to wash hands, heart disease, pneumonia, influenza, diabetes, alcoholism, liver disease, congenital anomalies, and other undefined “adverse effects”), but she identifies no connection between these factors and ISL mining. *See* Benally Testimony, at 13-20.

¹² In the FEIS, the Staff used the MILDOS-AREA code to calculate the total effective dose equivalent (TEDE) doses expected at various Church Rock receptor locations from Church Rock ISL facilities. These calculations showed that such receptor locations would receive annual TEDE doses of much less than one percent of the annual dose received from natural background sources. *See* FEIS Table 4.18, at 4-78, and 4-124.

Accordingly, the Presiding Officer should not accept any of Dr. Benally's testimony in this proceeding.¹³

3. Brugge Testimony

In addition to this testimony proffer being an untimely attempt to supplement previous groundwater issue arguments, and raising concerns which are not germane to this proceeding (*see* n. 6, *supra*), the Staff objects to the admission of the Brugge Testimony on the following grounds as well: (a) his testimony relies on a June 1997 draft report, referred to by Dr. Brugge as the "King Tutt Draft Assessment," regarding a study of an old uranium mining area near Shiprock, New Mexico (*see* Brugge Testimony, at 6-11); (b) ENDAUM and SRIC seek to insert into the record portions of the King Tutt Draft Assessment (*see* Brugge Attachment C), as well as data which is either taken from, or based on, the draft report (*see* Brugge Attachment D, Tables 1-3); and (c) the Brugge Testimony relies on Dr. Benally's BIPM results. *See* Brugge Testimony, at 9.

¹³ Should the Presiding Officer decide to the contrary, the Staff notes that, based on the directly affected populations listed in Dr. Benally's Table 4, any ecological risk assessment would not have the ability to discern any cause-effect relationships from the elevated radon concentrations in the outdoor air. The Staff also notes that with respect to Dr. Benally's criticisms that the FEIS failed to adequately evaluate the effects of past uranium mining operations (*see* Benally Testimony, at 12, 27-30, and 44-46), approval of such operations was not the federal action triggering the requirement to prepare the FEIS. The proper focus of the FEIS was on the anticipated impacts of HRI's proposed ISL mining. Accordingly, the FEIS analyzed those impacts, rather than performing an in-depth study of past uranium mining operations. The FEIS references to the effects of past uranium mining were adequate to ensure that an informed decision on HRI's license issuance would be made.

Accordingly, the Presiding Officer should not accept Dr. Brugge's testimony in this proceeding.¹⁴

B. Intervenors' Environmental Justice Contentions Lack Legal Merit

To the extent that the Intervenors do raise environmental justice issues which are within the scope of this phase of the proceeding, and are germane, these issues do not entitle the Intervenors to the legal relief they seek, for the reasons discussed below.

1. ENDAUM and SRIC environmental justice arguments lack legal merit

ENDAUM and SRIC's continued reliance on President Clinton's environmental justice initiative, Executive Order 12898 (*see* SRIC's Environmental Justice Brief, at 4-5, and 19), is misplaced. As the Commission has previously stated, Executive Order 12898, by its own terms, establishes no new legal rights or remedies. *See Louisiana Energy Services* (Claiborne Enrichment Center), CLI-98-3, 47 NRC 77, 102 and n. 19 (1998). ENDAUM and SRIC's discussion of this NRC adjudication (hereinafter cited generally as "LES" or "*Claiborne*") ignores this statement by the Commission, and otherwise fails to explain why their environmental justice arguments legally entitle them to relief. *See* SRIC's Environmental Justice Brief, at 5-6.

¹⁴ Should the Presiding Officer decide to the contrary, the Staff takes issue with Dr. Brugge's criticism that the FEIS analysis improperly failed to "address the impacts of trace metals in HRI's uranium ore." Brugge Testimony, at 12. Levels of trace metals such as vanadium, manganese, and arsenic, obtained from HRI underground ore zone samples, will be quite a bit higher than the type of surface mill tailings samples referenced by Dr. Brugge at page 8 and Table 1 of his testimony. Dr. Brugge's comparison of the respective levels (*cf.* Brugge Attachment F with Table 1 of Attachment D) misleads the reader by failing to explain the significant difference between HRI's core samples and the surface samples found in or surrounding the abandoned traditional uranium mining sites in the Shiprock area. Moreover, Dr. Brugge either ignores or is not familiar with one of the major environmental benefits of ISL mining when compared with traditional uranium mining: virtually all of the trace metal contaminants present in underground uranium ore remain in place during ISL mining and restoration.

ENDAUM and SRIC's reliance on the licensing board's largely discredited LES decision, LBP-97-8, 45 NRC 367 (1997), also ignores the significant factual differences between the LES adjudication and this proceeding. There, the property on which the proposed facility was to be built was located only one-third of a mile south of the town of Center Springs, Louisiana, and only two miles north of the town of Forest Grove. *See Claiborne, supra*, LBP-97-8, 45 NRC 367, at 370. Here, Church Rock is the only town in the vicinity of HRI's Section 8 site, and it is located more than six miles south of Section 8. *See Bullard Testimony*, at 16-17. More significantly, HRI's decision to conduct ISL operations on its Section 8 site is based on two simple facts: (1) Mineable uranium ore is located there; and (2) HRI holds lease rights there. *See HRI's Environmental Justice Response*, at 25. The situation here is thus in sharp contrast to LES, where many more subjective factors were involved in deciding on which of several sites an enrichment facility would be located. *See Claiborne, supra*, 45 NRC at 381-84. Accordingly, any reliance here on LES to advance environmental justice arguments is misplaced.

Moreover, the Staff fully met its environmental justice obligations in its FEIS discussion of those issues. *See FEIS* §§ 3.10 (at pages 3-78 to 3-87), and 4.12 (at pages 4-112 to 4-120). ENDAUM and SRIC's arguments that the FEIS was deficient in this respect (*see SRIC's Environmental Justice Brief*, at 18-39) fail to establish violations of any applicable requirements. For example, ENDAUM and SRIC rely in part on 10 C.F.R. § 40.36 in arguing that mitigative measures discussed in the FEIS are illusory. *See SRIC's Environmental Justice Brief*, at 29-30. As the Presiding Officer recently stated in this proceeding, the requirements of 10 C.F.R. § 40.36 are not applicable to ISL mining operations. *See LBP 99-13, 49 NRC* ___ (March 9, 1999), slip op. at 3.

ENDAUM and SRIC criticize the FEIS focus on the expected benefits of HRI's project (*see* SRIC's Environmental Justice Brief, at 33-35), but consideration of such benefits in an environmental impact statement is proper. *See Claiborne, supra*, CLI-98-3, 47 NRC 77, at 99-100. ENDAUM and SRIC complain that the 1994 draft of the environmental impact statement for HRI's project did not properly discuss environmental justice issues (*see* SRIC's Environmental Justice Brief, at 36), but fail to note that at the time of the draft's issuance, environmental justice concepts were still being developed, and were not even fully formalized for general use until December 1997.

ENDAUM and SRIC argue that the FEIS recommendation to issue a license to HRI reflected an improper "in-your-face approach" towards the Navajo Nation's moratorium on uranium mining¹⁵ (*id.*, at 38), but whether the moratorium prevents individual Navajo from granting rights to HRI, and whether the Navajo Nation has jurisdiction over HRI's Church Rock Section 8 site, are questions which were (and still are) unresolved. *See* FEIS, at 3-87, and 4-114.

Accordingly, ENDAUM and SRIC's environmental justice contentions, and the testimony proffered in support thereof, do not support the relief requested in SRIC's Environmental Justice Brief, at 39.

2. Sam's environmental justice arguments lack legal merit

Similar to the ENDAUM and SRIC environmental justice argument, many of the contentions made on behalf of Grace Sam and Marilyn Morris are outside the scope of this phase of the proceeding. *See* Sam's Environmental Justice Brief, at 7, and 10-13 (regarding the relocation of

¹⁵ It is not clear whether this 1983 moratorium applies only to traditional methods of mining uranium, or whether it also covers ISL mining. The moratorium's application is further clouded by the fact that it conflicts with the Federal Mining Law of 1872. *See* FEIS, at A-54.

Crownpoint drinking water wells); and *id.*, at 7, and 13-14 (regarding property values in the town of Crownpoint). Regarding the latter topic, even assuming that the FEIS discussion was somehow inadequate, it is clear from the FEIS citations provided (FEIS, at 3-53 and 3-60) that housing values in the town of Crownpoint were being discussed. Crownpoint is over 20 miles away from HRI's Church Rock Section 8 site. Reliance on the Commission's LES decision, *supra*, 47 NRC 77, at 108-09, is thus misplaced,¹⁶ since there the proposed project site was in close proximity to two towns, and these Intervenors do not explain how or why Crownpoint property values would nonetheless be affected by operations on Section 8. See Sam's Environmental Justice Brief, at 13-14.

Grace Sam and Marilyn Morris also misread LES in arguing that the Commission therein contemplated a three-step environmental justice analysis. See Sam's Environmental Justice Brief, at 5-6. Nowhere in the pertinent section of the LES decision did the Commission reference such an analysis. See *Claiborne*, *supra*, 47 NRC at 100-110. As discussed in HRI's Environmental Justice Response, at 4-8, the Staff properly followed the applicable environmental justice guidelines that were in effect at the time the FEIS was issued. Moreover, contrary to the claim that the Staff reached a "conclusion" that there would be an environmental justice impact (Sam's Environmental Justice Brief, at 7, *citing* FEIS at 4-112¹⁷), the Staff instead concluded that "the potential significant impacts

¹⁶ Reliance on Executive Order 12898 (*see* Sam's Environmental Justice Brief, at 4-5) is similarly misplaced, for the reasons discussed in Section B.1, *supra*.

¹⁷ Marilyn Morris and Grace Sam erroneously characterize the cited FEIS statement, which is an introductory remark to the environmental justice discussion in FEIS section 4.12. See FEIS, at pages 4-112 to 4-120 (discussing *inter alia* the topics of groundwater, surface water, transportation, health physics, ecology, land use, socioeconomic concerns, and cultural resources, and either the lack of impact or mitigation measures to address potential impacts).

of the proposed project can be mitigated.” FEIS, at xxi. There would thus be no environmental justice impacts.

Grace Sam and Marilyn Morris criticize the FEIS treatment of transportation risks, pointing to three “well-established facts” they allege were not adequately addressed: pedestrian use of roadways, presence of livestock near roads, and roadway usage at night. *See* Sam’s Environmental Justice Brief, at 7-10. These omissions do not support the relief requested, *i.e.*, the revocation of HRI’s license and preparation of another environmental impact statement. *See id.*, at 31-32.

First, these Intervenors assume that an unspecified number of pedestrians regularly use unspecified local roads near HRI’s Church Rock Section 8 site, and further implicitly assume that these same roads will carry increased traffic related to HRI’s operations. *See id.*, at 8. No affidavits or other evidence is provided to support the “well-established fact” of such road usage. As before, reliance on the Commission’s LES decision is misplaced, since no nearby communities bracket Section 8. Thus, unlike LES, a reasonable assumption regarding a significant amount of foot traffic cannot be made here.

Second, as to the contention regarding the presence of livestock near roads (*see* Sam’s Environmental Justice Brief, at 9), similar inadequacies as discussed above are present. The owners of such livestock are not identified. The roads impacted by the alleged problem are not specified. The Staff is unaware of any such livestock problem being identified during the development of the FEIS. To the Staff’s knowledge, no livestock roaming free were observed during the Presiding Officer’s site visit in September 1998. Accordingly, the alleged livestock problem is hardly a “well-established fact.”

Third, the contention regarding HRI's use of roadways at night (*see* Sam's Environmental Justice Brief, at 9-10) fails to establish any increase in probability that a release of licensed material would occur from a truck accident at night,¹⁸ than from one during the day. The chance that truck accidents would occur, and that such accidents would produce a materials spill, were both evaluated and found to be quite small. *See* FEIS, at 4-69 to 4-70, and 4-116. No basis is provided which calls into question the adequacy of these evaluations.

Accordingly, the environmental justice contentions of Grace Sam and Marilyn Morris do not support the relief requested in Sam's Environmental Justice Brief, at 31-32.

CONCLUSION

For the reasons discussed above, the Presiding Officer should (1) refuse to accept the proffered expert testimony filed on behalf of ENDAUM and SRIC; and (2) deny the Intervenors' requests for relief, as their arguments on environmental justice issues lack legal merit.

Respectfully submitted,


John T. Hull
Counsel for NRC Staff

Dated at Rockville, Maryland
this 1st day of April, 1999

¹⁸ HRI states in its March 29, 1999 filing, "[HRI's] Response To The Final Written Presentation Of Grace Sam and Marilyn Morris," at 2, that it will not be transporting licensed material to or from its sites at night.

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) Docket No. 40-8968-ML
HYDRO RESOURCES, INC.)
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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S RESPONSE TO INTERVENORS' PRESENTATIONS ON ENVIRONMENTAL JUSTICE ISSUES" in the above-captioned proceeding have been served on the following by U.S. Mail, first class, or, as indicated by a single asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, or, as indicated by double asterisks, via e-mail and express mail, this 1st day of April 1999:

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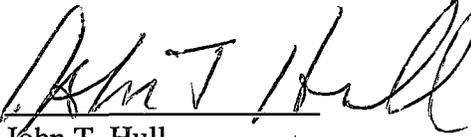
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