

From: [Gallagher, Carol](mailto:Carol.Gallagher@nrc.gov)
To: [Quintero, Jessie](mailto:Jessie.Quintero@nrc.gov)
Cc: [Trefethen, Jean](mailto:Jean.Trefethen@nrc.gov)
Subject: FW: Comments re: NRC-2012-0281
Date: Tuesday, January 30, 2018 8:36:30 AM

Comment on Marsland Expansion

From: Julie Santella [mailto:sante076@umn.edu]
Sent: Tuesday, January 30, 2018 12:29 AM
To: OIRA_DOCKET@omb.eop.gov; Gallagher, Carol <Carol.Gallagher@nrc.gov>; Trefethen, Jean <Jean.Trefethen@nrc.gov>
Subject: [External_Sender] Comments re: NRC-2012-0281

Hello,

I am writing with comments regarding NRC-2012-0281 (<https://www.federalregister.gov/documents/2017/12/15/2017-26934/crow-butte-resources-inc-marsland-expansion-area>). I attempted to submit my comments through the online [regulations.gov](https://www.regulations.gov) system, but I see now that I have missed the deadline of 11:59pm EST on January 29, 2018. I am writing from CST, where it is still 11:28pm. I wonder if it might still be possible for me to submit my comments. If so, please find my comments on this proposed expansion below.

Best wishes,
Julie Santella
PhD student
University of Minnesota Department of Geography, Environment and Society

I am writing to express my strong opposition to the proposed expansion of the operations of Crow Butte Resources, Inc. into the Marsland Expansion Area in Dawes County, Nebraska.

Cameco's operations at Crow Butte have had more than 75 documented violations and reportable events. As a result of the existing operations at Crow Butte, water downgradient in Pine Ridge, SD, has been negatively impacted. This came out in expert testimony on the matter of license renewal for Cameco, as well as in hearings for the NRC permit for the proposed Dewey-Burdock ISR project in SD. In the draft Environmental Assessment being considered by the NRC, there appears to be some consideration of the history and continued relevance of Euro-American colonialism in the Upper Plains in general and in the area of western Nebraska in particular. However, the draft EA's environmental justice analysis is limited in that it does not take into account potential impacts of this proposed expansion beyond the county or state boundaries of Dawes County and Nebraska, respectively. As the draft EA itself notes, Pine Ridge is located only 35 miles downgradient from the boundary of the proposed area. If concerns exist regarding the potential for contamination or pollution, which they do, based on Cameco's already documented violations and the challenges by Consolidated Petitioners which the Atomic Safety and Licensing Board upheld in relation to the case of Cameco's license renewal application in 2008, then it makes sense to consider the possible impacts of such contamination or pollution beyond the limits of Dawes County and the state of Nebraska and particularly in Pine Ridge. Aquifers do not obey county or state lines, and nor do spills, violations, or excursions.

There is also the question of who will cover the costs of cleanup when a spill or excursion occurs. Who will cover the costs of hazardous training for rural emergency responders, contaminated workers and equipment? Who will clean up license area soils that are contaminated because of toxic waste land applications? Who will monitor the spray discharge of the evaporation ponds' poisonous waste water as it settles on the surrounding fields and prairie? And who is accountable when tectonic stability is changed and movement occurs that allows poison production water to further contaminate regional groundwater?

I urge the NRC to expand the scope of its EJ analysis and think more carefully about the potential impacts of this project, both within Dawes County and Nebraska and beyond. I also urge the NRC to pause before granting a permit expansion to a company which has demonstrated its propensity for violations and reportable events without making clear who will be accountable when the company's environmental safety systems fail in the future. For the sake of all those living in the areas of the watersheds which stand to be affected by this proposed expansion, I urge the NRC to conduct more robust environmental impact assessment and environmental justice analysis before allowing this proposed expansion to go forward.

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