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Docket: NRC-2012-0281

License Amendment to Construct and Operate Marsland Expansion Area

Comment On: NRC-2012-0281-0005

Crow Butte Resources, Inc.; Marsland Expansion Area; Draft Environmental Assessment and Finding of No Significant Impact; Notice of Availability and Request for Comment

Document: NRC-2012-0281-DRAFT-0007

Comment on FR Doc # 2017-26934

Submitter Information

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General Comment

Docket ID NRC-2012- 0281

To Whom It may Concern,

I have some concerns about the Crow Butte Expansion into the Marsland.

1. The price of uranium is dropping nearly continuously as is the demand. This means that it will be likely that in the future, there will be little to no finances available to clean up and restore the aquifers affected in this dying industry. Clean sources of energy have proven themselves to be cheaper and more efficient for our future use, and are overshadowing the industry development for power sources, and without the radioactive and heavy metals toxic footprints left.

2. That the increased depth that drilling will have to go, 1400 ft, compared to much shallower and more common sources of 600 or so ft, make this project not only a more risky one, considering all the faults and fractures naturally occurring in the area, but also the additional expense in set up for a dying and profit losing project and industry.
3. I am concerned for the underground lake that will have to be penetrated by piping and opened to contamination of lixivient and reclamation fluids, that is pristine and drinkable. The West is losing its good sources of drinking water every day. We need not risk what we have left, again, for a dying industry.
4. The area's pristine nature is some of the last in the US, untouched by mining to date, or other environmental or development activities. ISL mining will ruin the water supply as will, by unavoidable spills, leave a toxic mess that cannot be reclaimed as the original Crow Butte mine has done. There has never been a case where the aquifers were restored to pre mining status and baseline in the history of ISL mining. Not even in Europe, where it has been banned because of such.
5. Because of the faults and fissures the entire depth of the 1400 ft pipe mining run, there is ample opportunity for contamination of groundwater due to expected leaks and excursions. Contamination of the groundwater would result in contamination of the 2600 wells downstream that irrigate sugar beets prominent in the area, as well as drinking water for animals that will enter the human food supply, and humans. With the sugar beets, the water soluble toxins will be extracted along with the sugar in the processing. For the non water soluble and organified metals, which are even more toxic and of higher bioavailability, those will be in the beet pulp residue that is made into a commercial feed product for animals who will enter the human food supply. Either way, the bulk of those metals will enter our food chain as well as contaminate the soils we grow the food on.

pg 3-54 ...no mention of the sugar beets, largest production in US.

"Cultivated fields of crops such as alfalfa, wheat, oats, corn, barley, and rye comprise about 300 acres (12 ha) or 6.3 percent of the MEA. It is likely that the cultivated fields were occupied by mixed-grass prairie prior to human alteration."

6. It has been shown that up to 40% of the uranium in a roll front is organified. That makes it non recoverable by ion exchange methods as the organified uranium will not stick to the organic resin beads. This will reduce the efficiency off the process by up to 40%. Testing for organified uranium should be mandatory before any permit is issued to see if there is significant uranium there that is available, and if the project is even worth it. Testing for organified and spectated metals should be included in monitoring projects as well, since the

known toxicity of the different chemical forms of metals can be orders of magnitude apart. As of now, there is no requirement.

7. I have prior, documented many of the health and toxicology effects of heavy metals on the living body in testimony to the NRC and ASLB

Docket No. 40-8943

ASLBP No. 08-867-02-OLA-BD01

May 1, 2015

Sincerely,
Linsey McLean