

From: [Protecting NM From All Things Nuclear](#)
To: [UNC-ChurchRockEIS Resource](#)
Subject: [External_Sender] Docket ID NRC-2019-0026
Date: Saturday, April 20, 2019 1:00:30 AM
Attachments: [2019-04-19 NISG scoping Docket ID NRC-2019-0026.pdf](#)
[ATT00001.htm](#)

I am submitting the attached letter on behalf of the Nuclear Issues Study Group as Scoping Comments for Docket ID NRC-2019-0026

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Program Management, Announcements and Editing Staff
Office of Administration
Mail Stop: TWFN-7-A60M, U.S.
Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Docket ID NRC-2019-0026

To NRC Staff,

We are submitting these scoping comments on behalf of the Nuclear Issues Study Group (NISG), based in Albuquerque, New Mexico.

We ask NRC to reject this license amendment application until UNC has done an adequate job of considering all input from all parties. In order to include stakeholders who were not adequately informed of UNC's proposal to move and store wastes on site, NRC needs to do additional outreach to all parties mentioned at the Public Meetings that took place in Gallup on May 19th, 2019 and May 21, 2019. NRC needs to send explanations of the proposed actions in plain language to all Navajo chapters and all non-Navajo communities within a 100 mile radius and those along possible transport routes. In addition, NRC needs to physically go in person to appropriate meetings of Navajo agencies with a professional Diné Bizaad translator to seek input from, but not limited to following: Navajo Environmental Protection Agency, Diné Uranium Remediation Advisory Commission, Navajo Abandoned Mine Lands/UMTRA Department, Eastern Navajo Land Commission, neighboring Navajo Chapters, and the Eastern Navajo Agency.

The Red Water Pond Road community, in the impacted area, has always demanded that the waste be moved off-site and off the Navajo Nation. Moving the waste across the street is not adequate disposal! NRC should consider other final resting places for this waste that is not within the communities of Eastern Navajo.

The community has also stressed the need for cleanup and has requested that the proposed cleanup be done sooner than later in the best methods possible. They have indicated that the proposed waste storage is in a floodplain. The issue of possible migration off site by flooding waters needs to be considered and perhaps the site is not suitable to store waste for hundreds of years. It is imperative to ensure waste will not be able to move into any existing surface or underground waterways, so as to reduce the risk of spreading further contamination downstream, such as into the Puerco River.

Whether the waste is moved by truck or conveyance, NRC must ensure the contracted parties use the best and most contained way possible to move the waste without risk of further contamination.

Storing waste for an unforeseeable amount of time into the future (at any site) needs to include permanent monitoring, signage, and fencing with maintenance of each for at least 1000 years or more, to ensure that waste does not spread into surrounding areas and that future generations do not disturb or live on the area.

Our organization does not support reprocessing of any type of waste. In this case, we do not support reprocessing of waste from Churchrock or from any other sites to be cleaned up at the White Mesa Mill. Reprocessing uses more water resources and creates more waste and would increase radon and other radioactive contamination around the White Mesa Mill. Waste must not further impact other communities, especially those already overburdened by existing nuclear facilities.

We requests that more public meetings take place in the impacted areas, including communities along transport routes and possible sites to which UNC is considering moving Principle Threat Wastes (PTW).

Lastly, NRC needs to hold UNC accountable to cleanup the entirety of the 1979 Churchrock uranium mill tailings spill that contaminated the Puerco River and areas off-site and downstream from the licensed area. When it rains in the Puerco, the local communities can still smell residual chemical that remain from the spill. UNC needs to work with appropriate agencies to characterize that mess and clean it up! This includes any surface and groundwater resources that are still contaminated from that spill and replacement of contaminated water tanks, plumbing systems, and other contaminated infrastructure. There remain many permanent, adverse health impacts from said spill which have harmed plant, animal, and human populations including contamination to the environment and cultural resources. NRC needs to direct UNC to address other impacts from their mining and milling operations and impose requirements for reparations, including funding for health studies and monitoring of contaminated areas.

Waste is not allowed to be stored under the current license. We request that NRC reject the application to amend UNC's license until UNC gets input from and creates a new plan that is approved by the above named Navajo entities. In addition, we request that UNC start a parallel process to get input from communities impacted by the 1979 spill and start a cleanup of that will not impede the cleanup of the Churchrock mine waste.

Thank you,



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Nuclear Issues Study Group



Denise Brown
Uranium Committee
Nuclear Issues Study Group