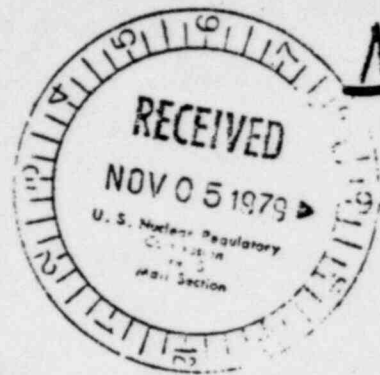


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129 Cassa Avenue
Mershey, PA 17C33
23 October 1979

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Director, Division of Waste Management
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Sir or Madam:

(Although I could probably address this communication to "Sir" with impunity, since the NRC is one of the worst examples of sexism in government, machismo madness, sewer sickness due to overexposure to the male superiority myth, and dedication to the preservation of the military-industrial-patriarchy system that so dominates the world today.)

The following are my comments on NUREG 0511 Draft Generic Impact Statement on Uranium Milling.

Before presenting my comments on NUREG 0511, I must state that not objecting to any particular part of this DGEIS is not to be construed as agreement with any part of this DGEIS. Because I have not the time, inclination, or funds to state all my objections does not mean I agree with any particular item in NUREG 0511.

The greatest omission--and I sincerely believe it is a purposeful, deliberate and wilful omission--is the omission of any mention of the uranium mining industry in the Eastern U.S. DOE--Department of Energy--has made aerial surveys of uranium deposits in Pennsylvania and New Jersey. Nonetheless, the entire document is written and specifically states that mining and milling is assumed to be only in the Western U.S. This DGEIS considers only thirteen (13) states out of fifty (50). This is a purposeful, deliberate, wilful and gloriously blatant omission. (Section 3--all parts).

Pages 2 and 3: Methods of assessment. In this section, the projections used were developed before the accident began at the Three Mile Island Nuclear Generating Station, in Londonderry Township, Dauphin County, Pennsylvania, on March 28, 1979, in the Unit 2 of that station. Please note that I am carefully pinpointing the time and date and place of the accident, in the event that Three Mile Island Unit 1 is returned to service (God forbid) and there is another accident at the same site. (God forbid). At the very minimum, this DGEIS, and all other DGEIS and all EIS which used projections of nuclear growth developed before the accident began at TMI Unit 2 must be retracted and redone using updated, current, and truthful projections based on the projection of TURNING OFF ALL THE NUKES TOMORROW, DUE TO THE PRIMAL PUBLIC OUTRY AND SCREAMS OF RAGE REGARDING THE LACK OF SAFETY INHERENT TO ALL PARTS OF THE NUCLEAR FUEL CYCLE, AND ALL NUCLEAR INDUSTRIES. (This point is negotiable if the nukes are turned off today.)

Page 6, Table 1, note c: These risks are for a twenty year span--which is a ridiculously short period of time in any matter concerning uranium. The issue of human life is not even considered here. The tailings from uranium milling will be emitting radon for millennia, radon that will find its way into human lungs. There will be 1,200,000 human deaths (premature human deaths) for every year of nuclear reactor operation--nuclear reactor operation that will not be possible without uranium mining and the leaving of enormous piles of tailings to emit radon. The same errors are presented in Table 6.16, page 6-41, and again on page 9-30. The cumulatives are taken only to the year 3000 AD. The only possible way that this assumption of a cut-off date of 3000 AD for human deaths associated with radon to be true is for no human beings to be alive after 3000AD. I sincerely hope that there are humans around here after the year 3000 AD--and if they are, your date for the cut-off of radon-related deaths will seem inhumanly and almost incomprehensibly

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feeling and stupid.

Page 7, at Table 2: Presumably, because you're putting in the very small fractional increase in deaths due to the milling industry, you are somehow trying to justify the milling industry because it has such a "small impact."

Page 5-5: "The model mill is not designed to process low grade ores (.4%). Take a look at the recent mining EIS's which you have in your list of references. Your description of heavy leaching is not amenable to the surface and ground water contamination problems in the Carbon County area of Pennsylvania. Ground water contamination is even more of a problem in New Jersey. I mention these states because DOE has done aerial surveys of uranium deposits in these states--and seems interested in starting the uranium mining-milling-death industries here in the Eastern U.S. This is an EIS that has not dealt with the most difficult problems of a mining-milling operation.

Page 7-10: Are you sure that this accident was covered with elastic sheeting within three hours? Why do spectators who witnessed the accident not remember the covering with elastic sheeting?

Page 12-10, paragraph 12.3.3.3: Risks to Individuals--In the preceding section, you talked about control of radon emissions to background levels. Then you say, "The surgeon general guidelines specified no remedial action is needed for homes with an inside exposure level of less than 0.01 WL above background." It is clear that control of radon to background levels is not what the NRC or any one else in the nuclear fraternity really wants--they want to know how well people survive at 0.01 WL above background.

There are so many, many inherent and inescapable dangers in nuclear power, the nuclear fuel cycle, the whole nuclear package.

If you have a conscience, besides doing your best to throw out this DGEIS and doing another one that will tell the whole, true story, do more. Perhaps a small, non-tax-deductible (sorry, that's how the government works) contribution to the Environmental Coalition on Nuclear Power, in Pennsylvania. I am sure you are well aware of what this group is and how much good, honest, hard work they have done in the name of humanity and survival. These comments on NUREG 0511 were not written for EICP. I only mention them as one of many good, honest, hard-working anti-nuclear groups.

In conclusion, I hereby request that your office send a copy of the final version of the DRAFT GENERIC ENVIRONMENTAL IMPACT STATEMENT, NUREG 0511, to me at this address: Ms. Susan R. Barley
129 Coosa Avenue
Hershey, PA 17033

Signed:

Susan R. Barley

Susan R. Barley

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I here by certify that this communication was deposited in the
United States mails, on this 24th day of October, 1979.

Signed

Susan R. Barley.

Susan R. Barley

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