



PDR

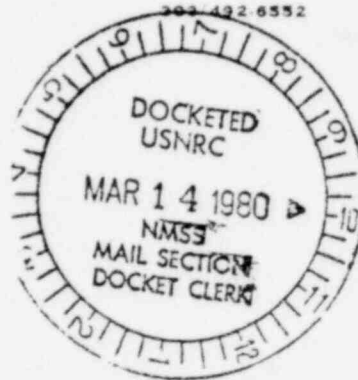
40-4492

National Wildlife Federation

NATURAL RESOURCE CLINIC
UNIVERSITY OF COLORADO SCHOOL OF LAW
BOULDER, COLORADO 80309

ROBERT J. GOLTEN
SENIOR COUNSEL

March 7, 1980



D. M. Gillen
U.S. Nuclear Regulatory Commission
Division of Waste Management
483-SS
Washington, DC 20555

Re: Federal-American Partners Uranium Mill
Docket No. 40-4492

Dear Mr. Gillen:

This letter is to follow up our previous comment on the scoping of the Draft Environmental Impact Statement for the relicensing of the Federal-American Partners Uranium Mill. Our purpose is to supply you with some additional information which might be of use.

First, in a conversation I had with an NRC staff member, I was told that one of the reasons why there had not been more attention given to the problem of herbivores (deer, antelope, and elk) being exposed to toxic materials and radionuclides through consumption of contaminated forage was that it was believed that deer ate a significantly higher portion of grass than cattle. Since it was believed that more radionuclides would settle onto the broad-leaved plants which cattle were thought to eat, it was concluded that exposure for cattle would be greater than exposure for deer or antelope grazing in the same area.

Dr. Dwight Smith of Colorado State University Department of Fishery and Wildlife Biology informs me that a study of the food habits of antelope in eastern Colorado revealed that grass made up 20% of the diet in the spring, but only 1% in summer and fall. Forbs (broad-leaved plants) made up 66% in summer, only 22% in fall. Browse accounted for 72% of their food in fall, but only 22% in summer. In summary, the yearly averages were: browse--43%, forbs--42%, cacti--11%, and grass--4%.

8004020053

15743

FILE EXEMPT *if only*

Add into

Received WJHR
MAR 13 1980

Mr. D. M. Gillen
Page 2
March 7, 1980

While deer diets would vary by habitat, they would generally have a higher proportion of browse, somewhat less forbs, little cacti, and possibly more grass. Grass consumption would still be minor, however, except in spring.

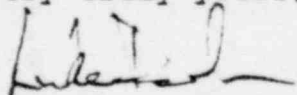
Therefore, if in fact broad-leaved plants retain significantly more of the dust containing radionuclides and toxics, one would expect deer and antelope to be more exposed to them than are cattle, which, while they do eat some broad-leaved plants, are primarily grass eaters.

Second, we have seen in previous environmental impact statements prepared by NRC, and have heard from comments made by NRC staff, that deer and antelope are presumed to range over such a wide area that the time which they spend in the vicinity or "zone of influence" of a particular uranium mill is thought to be minimal. This is not necessarily an accurate assumption. If habitat and other conditions are right, it is possible that these animals may spend a fairly substantial portion of their time in the area of a particular mill. No general conclusions are possible about the size of range of these animals--under some conditions they may range over a very small area, while under other conditions the same animals may range over wider areas. We would suggest that you do whatever is possible to obtain information from biologists with knowledge of local conditions before drawing any conclusions as to the migration patterns of these animals in this area.

Finally, of course, this applies only to the situation with respect to the deer and antelope. As we have earlier urged you, we believe that it is necessary to look at a broader range of animals. In particular, we are concerned with possible concentration of both toxics and radionuclides in the food chain.

I would point out that the major incidents of which I have been made aware relating to poisoning of animals in the vicinity of uranium mines or mills have involved toxics--particularly heavy metals--rather than radionuclides. Therefore, we strongly urge that the subject of toxics be looked at in a comprehensive way, including the cumulative effects of releases from the many mines and mills in the area.

Very truly yours,



Luke J. Danielson, Counsel

dh

cc: Mr. John Linehan, U.S. NRC

15743