



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DCS
WM-24

JUL 15 1980

Ms. Lois Remple
Citizens for Safe Energy
419 Van Buren
Pueblo, Colorado 81004

Dear Ms. Remple:

This is in response to your letter of June 22, 1980, concerning a proposal that a cumulative impact study be made of the potential uranium development in the 5-county area in Colorado comprised of Custer, El Paso, Fremont, Pueblo and Teller Counties. You stated that you are specifically looking for support for the concept of the study and funding sources to enable an agency to conduct the study.

With regard to your first question, a determination concerning the need for a costly regional study would have to be based on firm information on the likely amount and concentration of uranium development. Although the Pikes Peak Justice and Peace Commission's paper entitled "Potential Uranium Development in Southern Colorado" does indicate large holdings by companies of lands in the area, it is not clear that these holdings can be correlated with uranium development. On the basis of DOE projections as reported in the Generic Environmental Impact Statement on Uranium Milling (GEIS) it does not currently appear that uranium development in Colorado will be particularly concentrated (see GEIS, pp. 3-13 to 3-17).

In addition, the GEIS included the results of an evaluation for a case in which a concentration of uranium milling was postulated (12 1800-MT/day mills within a 50-mi radius). As a result of that evaluation, it was concluded that because impacts tend to be localized, unacceptable accumulations of radiological and non-radiological impacts are not expected to occur for cases where there will be a concentration of mining and milling activity. (See, for example, Sections 5.1 and 5.4 of the GEIS, Summary.) The cumulative effects that will potentially be most significant are socio-economic ones. Although the GEIS states that in some worst case conditions a regional approach towards mitigating socio-economic impacts may be desirable, the impacts can generally be mitigated on a case-by-case basis. It is not clear, and even doubtful,

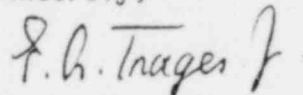
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that significant socio-economic impacts warranting a special, regional study will occur given the level of uranium development which has been projected for the region of your concern. The current situation does not call for more than the site-specific environmental assessments which I referred to in my letter of June 19, 1980. Therefore, we do not currently have a basis upon which to support the concept of your study.

With regard to your second question, we are unaware of sources of funding for such a study if it were to be done. Please note, however, that the Congress in passage of the Uranium Mill Tailings Radiation Control Act of 1978 (Section 114(c)) charged the U. S. EPA with preparing a study on the potential public health, safety and environmental hazards associated with uranium mining activities. Therefore, the EPA's Office of Radiation Programs may be of assistance to you in this matter.

If you have any further questions or comments concerning this, please call me at (301) 427-4547.

Sincerely,



Eugene A. Trager
New Facilities Section
Uranium Recovery Licensing Branch
Division of Waste Management

cc: Dr. A. Hazle, Executive Director
Radiation and Hazardous Wastes
Control Division, CDH

CITIZENS FOR SAFE ENERGY
419 Van Buren
Pueblo, CO 81004
(303) 544-2327

Ticket →
please

June 22, 1980



Mr. Eugene A. Trager
Uranium Recovery Licensing Branch
Division of Waste Management
Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Trager:

Thanks for your letter of June 19, regarding a proposed study of potential uranium development in Colorado. I'm afraid perhaps I did not make as clear as I should have what our concerns are.

We are aware of Colorado's status as an agreement state and we do realize that each individual uranium development project is subject to licensing regulations and assessment. In fact, we have testified at all the hearings so far held on the Hansen project of Cyprus Mines Corporation and expect to testify at those to be held in the future. That is one area of involvement for us.

However, the potential uranium development is another matter. We are asking for a cumulative impact study of the entire area that has been staked out for potential development (uranium) in the 5-county area I mentioned in my letter. Dr. Traylor, of the Colorado Health Department, has met with us and supports the concept, as do several state legislators, the Pueblo Area Council of Governments, the local health department, and others.

We believe that a study of the total impact should be done, rather than the case by case evaluation that your letter mentions, although the latter would have to be done, too, as licenses are applied for.

Are you familiar with the large, very comprehensive study that was done of the San Juan Basin in New Mexico?

Specifically, we are looking for two things: support for the concept of the study, and funding sources, not for our organization or the Pikes Peak Justice and Peace Commission, but for the agency that will ultimately conduct the study. Dr. Traylor suggested we seek funding sources and agreed to see what he could do.

Sincerely,

Lois Remple
Lois Remple

Copy to Al Hazle, Executive Director, Radiation and Hazardous Wastes Control Division, CDH