



United States Department of the Interior

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE

655 Parfet Street

P.O. Box 25287

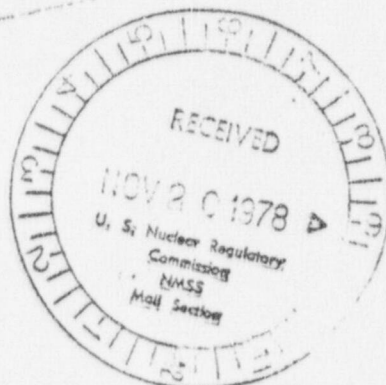
Denver, Colorado 80225

40-8698

IN REPLY REFER TO:
L7621 (RMR)PC
(ER 78/716)

SEP 28 1978

Mr. Richard E. Cunningham
Acting Director
Division of Fuel Cycle and Material Safety
Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Cunningham:

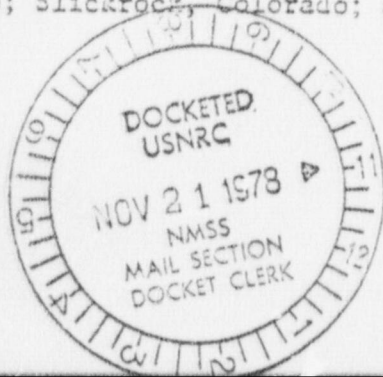
As stated in our previous letter, we are now submitting comments received from Canyonlands National Park's review of the environmental report and related documents for the Shootering Canyon Uranium Project, Garfield County, Utah.

1. Section 2.7 - Meteorology and Air Quality: We are concerned that operation of the plant may contribute to visibility deterioration at Canyonlands National Park during winter stagnant air conditions which can persist for extended periods of time. The Shootering Project alone would probably contribute little to this problem. We are concerned about the cumulative effect of adding new sources of pollutants to those already existing. Loss of visibility and brown, yellow and purple haze coloration have already been observed from the park during winter air stagnation periods. This visibility reduction has been observed from the southwest in the vicinity of the Henry Mountains north along the San Rafael Reef to the Book Cliffs. Class I air must not be adversely affected.

2. Section 10.0 - Alternatives to the Proposed Action: Again, as with our review of the environmental report for the White Mesa Uranium Project earlier, we wonder if it is advisable to continue the proliferation of tailings piles in the Four-Corners Region in light of the following facts:

A. There are active mills and tailings operations at the following locations: 1) Atlas Minerals in Moab, Utah; 2) Rio Algom in LaSal, Utah; 3) UCC (Union Carbide) in Uravan, Colorado.

B. Abandoned tailings piles are located at Mexican Hat, Utah; Naturita, Colorado; Slickrock, Colorado; and Shiprock, New Mexico.



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C. Congress is considering a bill for cleaning up uranium tailings that will cost millions of dollars.

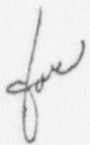
D. The Administration's Interagency Review Group (IRG) is developing recommendations for nuclear waste disposal including tailings.

E. The Senate has approved legislation for studies of radiation hazards to be conducted by your Agency and the Environmental Protection Agency.

There are now two new proposed projects--Shooter Canyon and White Mesa--both in southeast Utah. It would seem that the Federal Government has some responsibility in coordinating use of mills and/or tailings ponds already existing rather than allowing the creation of additional problems by the development of more tailings sites. All of the existing sites, active and inactive, should be considered as alternatives. At the very least, consideration should be given to consolidating all new approved projects at one site or at the most two or three sites in southeast Utah.

Sincerely yours,

(SGD) JAMES B. THOMPSON



Glen T. Bean
Regional Director
Rocky Mountain Region

cc:

1 Mr. J. R. Rookstool, Plateau
Resources Limited, Grand Junction CO