

**From:** sarah uraniumwatch.org <sarah@uraniumwatch.org>  
**Sent:** Monday, November 23, 2020 6:20 PM  
**To:** ChurchRockEIS.resource@nrc.gov  
**Cc:** Waldron, Ashley  
**Subject:** [External\_Sender] Corrected - Request for Extension of Time for  
Comments on draft EIS  
**Attachments:** Corrected\_UW\_NRC\_UNC\_draftEIS\_ExtensionRequest\_Dkt.NRC-2019-  
0026\_112320.pdf

Program Management  
Announcements and Editing Staff  
Office of Administration  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001  
ChurchRockEIS.resource@nrc.gov

Attached please find corrected letter, Request for Extension of Comment Period. United Nuclear Corporation Church Rock Project (Docket No. 40-8907), Draft Environmental Impact Statement. 85 Fed. Reg. 72706; November 13, 2020. Docket ID NRC-2019-0026.

Sorry for any inconvenience.

Sincerely,

Sarah Fields  
Program Director  
Uranium Watch  
PO Box 1306  
Monticello, Utah 84535  
435=260-8384

**Federal Register Notice:** 85FR72706  
**Comment Number:** 1

**Mail Envelope Properties** (BY5PR14MB3544842679C3E830B3DE3D0ED7FC0)

**Subject:** [External\_Sender] Corrected - Request for Extension of Time for Comments on draft EIS  
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**Received Date:** 11/23/2020 6:20:06 PM  
**From:** sarah uraniumwatch.org

**Created By:** sarah@uraniumwatch.org

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Files	Size	Date & Time
MESSAGE	589	11/23/2020 6:20:06 PM
Corrected_UW_NRC UNC_draftEIS_ExtensionRequest_Dkt.NRC-2019-0026_112320.pdf		
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**Options**  
**Priority:** Standard  
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# Uranium Watch

P.O. Box 1306  
Monticello, Utah 84535  
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November 23, 2020

via electronic mail

Program Management  
Announcements and Editing Staff  
Office of Administration  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001  
[ChurchRockEIS.resource@nrc.gov](mailto:ChurchRockEIS.resource@nrc.gov).

RE: Request for Extension of Comment Period. United Nuclear Corporation Church Rock Project (Docket No. 40-8907), Draft Environmental Impact Statement. 85 Fed. Reg. 72706; November 13, 2020. Docket ID NRC-2019-0026.

Dear Sir or Madam:

Uranium Watch herein submits a request for a 60-day extension of the public comment period on the draft Environmental Impact Statement (EIS) for amendments to the United Nuclear Corporation (UNC) Church Rock Uranium Mill, Docket No. 40-8907.

The request for public comment was noticed in the *Federal Register* on November 13, 2020 at 85 Fed. Reg. 72706. According to the Public Notice, "UNC is requesting authorization to amend its license (SUA-1475) to excavate approximately 1 million cubic yards of mine waste from the Northeast Church Rock Mine Site and dispose of it at the existing [Church Rock] mill site in McKinley County, New Mexico."

Uranium Watch also requests that the NRC change the time or provide additional online evening webinars for public comment on the draft EIS. The webinars are currently scheduled for 4:00 p.m. (EST), or 2:00 p.m. MST) on December 2 and 9, 2020. The NRC should schedule at least 2 webinars during the evening after work and work travel, for example, starting at 6:30 p.m. or 7:00 p.m. MST.

The Public Comment Extension Request is based on the following:

1. The UNC license amendment request and the draft EIS are extensive documents, which demand careful review and consideration.

2. The comments period brackets two major holidays: Thanksgiving and Christmas. It does not make sense for the NRC to have a comment period during major holidays.
3. The proposed action involves and directly impacts several tribal communities in both New Mexico and Utah. These include the Navajo Nation and the Ute Mt. Ute Tribe. The country is currently in a unique and growing health crisis with multiple restrictions on travel and activities due to the coronavirus pandemic, particularly on the Navajo Nation. Monday, November 16, 2020, the Navajo Nation entered a 3-week lockdown in an effort to stop the spread of infections.<sup>1</sup> This shutdown may need to be extended. The focus of the tribal communities should be on protecting the health and wellbeing of their families from the coronavirus.
4. A separate, but directly related action, is the possible disposal of North East Church Mine Site “Principal Threat Waste” (PTW) at a uranium mill in Utah, adjacent to a Ute Mt. Ute tribal community. Yet, it does not appear that the NRC or the Environmental Protection Agency ever contacted that community or their tribal government in this regard. The Ute Mt. Ute tribe needs additional time to to evaluate this proposal and its implications and environmental impacts.
5. The extension of the public comment period will not significantly delay the project or adversely impact UNC.

The request a change the time for or additional evening online webinars on the draft EIS is based on the following:

6. The December 2 and 9 webinars are scheduled in the afternoon (2:00 pm MST) in the communities that are directly affected by the proposed uranium mine waste removal and disposal project. This is the middle of the day, when many people are at work. It is also the time when families are engaged in teaching children at home, due to the shutdown of schools because of the coronavirus outbreak. The NRC should schedule at least 2 webinars during evening hours after work and work travel hours.

Thank you for your consideration of this request.

Sincerely,

/s/

Sarah Fields  
Program Director

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<sup>1</sup> <https://www.npr.org/sections/coronavirus-live-updates/2020/11/16/935445425/navajo-nation-enters-new-lockdown-as-coronavirus-cases-rise>