

# PUBLIC SUBMISSION

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UNC Church Rock

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**Comment On:** NRC-2019-0026-0007  
United Nuclear Corporation Church Rock Project;

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## Submitter Information

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## General Comment

See attached file(s)

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## Attachments

RE\_ NRC-2019-0026-0007

Comment letter

To the Nuclear Regulatory Commission,

Thank you for the opportunity to comment on NRC-2019-0026-0007. I am a student in environmental science and management at Portland State University that is close to graduating with a bachelor in science. My specialty lies within plant ecology and biology, with coursework in water resources as well. I have a previous four-year science degree in History where my coursework revolved around ethics and racism.

Alternative 1B of the proposed project action is the best proposed option for transportation of the waste materials to the impoundment United Nuclear Corporation Mill site from the NECR Mine site. The DEIS report goes into depth on cumulative impacts to the region with actions taken for residence. I would like to commend the report in its thorough analysis and actions to be taken with deep consultation and partnering with the Navajo Nation and participating agencies.

Nuclear waste materials are difficult to dispose of. Cross state transportation to either US Ecology in Idaho or other decontamination sites posed a higher possible environmental contamination and health hazard risk. The offsite transport to Idaho or Utah alternate being dismissed was the best decision. A large outcry against the project was a possible outcome if it was preferred. Impounding the nuclear waste material onsite in stable and secure conditions is the best possible option with appropriate capping and long-term monitoring. Long-term water monitoring at the tailings impoundment at the UNC Mill Site is expected to have some impacts on the local regions water quality. The amount of impact over long periods of time based on the analysis against the no change proposal is justified compared to leaving the tailings and waste soil materials open to air and disturbance.

Soil disturbance from the construction and removal from NECR tailings and waste is greatly detailed. 138 ha or ~340 acres of land is significant removal causing dust dispersion to the local area and residence. The DEIS report highlights this issue with preventative actions and monitoring air quality from radon gas emissions and contaminated dust, while also removing previous contaminated air dispersed deposition at residences property.

Cumulative impacts on the Navajo Nations land and people are taken greatly into consideration within the DEIS Cumulative Impacts section 5. Actions have already been undertaken to remove contaminated soils from residences surrounding NECR, Quivira and other mines property to the NECR Mine Site. Consolidating all of this waste to the NECR Mine Site for future removal was a good call. The residences removal was not greatly detailed or how it was transported in the DEIS but was referenced as appendix e (EPA, 2019e). Water recourse future impact consideration was set to 1000 years in the future in section 5.1.2. This also shows detail on future groundwater impacts from incremental and cumulative impacts from the project which is considerable. This is not something that can be avoided because of the prior mining operation that was established by UNC and other uranium mining facilities within the region.

In summary, I am quite surprised by the level of detail, involvement, and funding for this project on Navajo Nation property with EPA appointed by the Navajo for cleanup. This DEIS has taken a long-term comprehensive approach to dealing with the UNC Church Rock mining site. Alternate 1B is the preferred proposed action plan. I support Alternate 1B fully.

Sincerely,

Mathew Pedersen

B.S. History, soon B.S Environmental Science and Management

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Mathew Pedersen  
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