

From: Susan Gordon - MASE <sgordon@swuraniumimpacts.org>
Sent: Thursday, May 27, 2021 5:38 PM
To: UNC-ChurchRockEIS Resource
Subject: [External_Sender] Docket ID NRC-2019-0026 [License No. NUREG-2243] NE Churchrock DEIS Waste Consolidation
Attachments: 21.05.26 NRC group sign on letter.pdf; ATT00001.htm

Federal Register Notice: 85FR72706
Comment Number: 81

Mail Envelope Properties (04F7E2FC-DC37-4D69-8C42-005AAFD4BE4F)

Subject: [External_Sender] Docket ID NRC-2019-0026 [License No. NUREG-2243] NE Churchrock DEIS Waste Consolidation
Sent Date: 5/27/2021 5:37:49 PM
Received Date: 5/27/2021 5:38:01 PM
From: Susan Gordon - MASE

Created By: sgordon@swuraniumimpacts.org

Recipients:

Post Office: swuraniumimpacts.org

Files	Size	Date & Time
MESSAGE	0	5/27/2021 5:38:01 PM
21.05.26 NRC group sign on letter.pdf		65557
ATT00001.htm	3888	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

U.S. Nuclear Regulatory Commission
Office of Administration
Mail Stop: TWFN-7-A60M
Washington, DC 20555-0001
ATTN: Program Management, Announcements and Editing Staff

Re: Docket ID NRC-2019-0026, Red Water Pond Road Community Association Preliminary Comments on Waste Consolidation Draft Environmental Impact Statement [License No. NUREG-2243]

May 27, 2021

Dear Mr. Tappert:

We the 72 undersigned organizations representing thousands of grassroots members submit these comments in support of the Red Water Pond Road Community located on Navajo Nation.

The Red Water Pond Road Community is demanding that the Northeast Churchrock Mine Wastes be removed from their community and from the boundary of Navajo Nation lands and we sign this letter in solidarity of their position.

The weight of the United States' atomic history lies most heavily on Indigenous communities. Since the dawn of the atomic age, these communities on the Navajo Nation have suffered from the natural resource destruction and public health catastrophe caused by uranium development, and should no longer be forced to bear the overwhelming and disproportionate burden of uranium contamination.

The Northeast Churchrock Mine (NECRM) is the largest abandoned uranium mine on the Navajo Nation. The Red Water Pond Road Community, is located between the NECRM and the Kerr-McGee-Quivira Churchrock I Mine ("Quivira Mine"), and within one mile of the United Nuclear Corporation (UNC) uranium mill and mill tailings disposal facility. All three sites are subject to the federal Superfund law (CERCLA). The UNC tailings facility is both a Superfund National Priorities List site for cleanup and a Nuclear Regulatory Commission-licensed tailings disposal facility under the Atomic Energy Act.

The NECRM and Quivira Mine are located principally on Navajo Tribal Trust Land, while the UNC mill and tailings impoundment is located on private land immediately adjacent to the Navajo Nation.

The UNC mill tailings impoundment was the site of the July 16, 1979 Churchrock Dam Break, which released 94 million gallons of acidic and radioactive wastewater and 1,100 tons of radioactive mill tailings into the North Fork of the Puerco River in what remains the largest release of radioactive waste, by volume, in U.S. history. Published reports indicate that contamination from the tailings spill, combined with more than twenty years of discharge of contaminated mine water from mines in the Churchrock area during the 1960s through 1980s, still remains in downstream communities, including in the area of Sanders, Arizona and the Navajo community of Nahata' Dziil.

The Red Water Pond Road Community is forced to live with the consequences of the Federal Government's unwillingness to form a coherent policy for uranium mine and mill waste disposal.

Rather than continue to dispose of mine waste on an ad hoc basis, we demand that the Federal Government devise a holistic policy of uranium mine and mill remediation that includes one or more repositories for uranium mine and mill waste.

The Nuclear Regulatory Commission (NRC) and the U.S. Environmental Protection Agency (USEPA) should work with tribal, state and especially community stakeholders to develop criteria for siting a repository that would serve as a safe and secure location to emplace uranium waste in perpetuity and designate a site for that purpose. Sites could include geotechnically appropriate Department of Energy legacy sites, public lands, off-reservation Superfund uranium sites or New Mexico state lands. Continuing to cover uranium waste piles in place or near uranium-impacted communities is unacceptable as a matter of policy and of environmental and racial equity.

If the Federal Government refuses to create a serious and cogent uranium mine and mill waste policy, it should, as a secondary alternative, move Red Water Pond Road Community members to a culturally appropriate location of their choosing.

We therefore demand that the NRC and USEPA take the following steps with respect to removal of the NECRM wastes:

1. The NRC should withdraw the Draft Environmental Impact Statement from further consideration and instead start a process, in cooperation with impacted communities, Navajo Nation agencies, and other Federal and New Mexico regulatory agencies, to look for acceptable disposal sites for AUM and mill wastes in the region that are outside the Navajo Nation and not immediately adjacent to the Navajo Nation;
2. The NRC should DENY General Electric's application to amend its license to allow for the consolidation of NECRM waste on UNC mill tailings;
3. All parties responsible for the NECRM waste should collectively relocate the Red Water Pond Road Community to a culturally appropriate location of the community's choosing.

Regards,

Susan Gordon, Coordinator

Multicultural Alliance for a Safe Environment
Albuquerque, NM
and the 71 organizations listed below

cc: Ms. Ashley Waldron, U.S. Nuclear Regulatory Commission
Mr. James Smith, U.S. Nuclear Regulatory Commission
Ms. Sara Jacobs, U.S. Environmental Protection Agency, Region 9

Albuquerque Monthly Meeting of the Religious Society of Friends (Quaker)

Sara Keeney and Chadron Kidwell, Co-Clerks
Albuquerque, NM

Alliance for a Green Economy

Jessica Azulay, Executive Director
Syracuse, NY

Amigos Bravos

Joseph Zupan, Executive Director
Taos, NM

Beyond Nuclear

Kevin Kamps, Radioactive Waste Specialist
Takoma Park, MD

Black Hills Clean Water Alliance

Carla Rae Marshall, Director
Rapid City, SD

Bluewater Valley Downstream Alliance

John Boomer, President
Milan, NM

Cape Downwinders

Diane Turco, Director
Harwich, MA

Chesapeake Physicians for Social Responsibility

Gwen DuBois, President
Baltimore, MD

Citizen Action New Mexico

Dave McCoy, Executive Director
Albuquerque, NM

Citizens Action Coalition of IN

Kerwin Olson, Executive Director
Indianapolis, IN

Citizens for Alternatives to Radioactive Dumping

Janet Greenwald, Coordinator
Dixon, NM

Citizens' Environmental Coalition

Barbara Warren, Executive Director
Cuddebackville, NY

Citizens' Resistance at Fermi Two

Jessie Collins, Co-chair
Redford, MI

Coalition for a Nuclear Free Great Lakes

Michael Keegan, Chairperson
Monroe, MI

Coalition to SAVE the Menominee River

Dale Burie, President
Marinette, WI

Concerned Citizens for Nuclear Safety

Joni Arends, Executive Director
Santa Fe, NM

Connecticut Coalition Against Millstone

Nancy Burton, Director
Redding, CT

Conservation Voters New Mexico

Demis Foster, Executive Director
Santa Fe, NM

Council on Intelligent Energy & Conservation Policy

Michel Lee, Chair
Scardale, NY

Dallas Peace and Justice Center

Mavis Belisle, Co-Chair
Dallas, TX

Diné Citizens Against Ruining our Environment

Carol Davis, Executive Director
Dilkon, Navajo Nation

Don't Waste Michigan

Alice Hirt, Co-Chair
Holland, MI

Don't Waste Michigan Sherwood Chapter

Kathryn Barnes, Board Member
Sherwood, MI

Don't Waste Arizona

Stephen Brittle, President
Phoenix, AZ

Earthworks

Aaron Mintzes, Senior Policy Counsel
Washington, DC

Eastern Navajo Diné Against Uranium Mining

Jonathan Perry, Co-Chair
Becenti, Navajo Nation

Georgia Women's Action for New Directions

Cee' Cee' Anderson, President
Atlanta, GA

Gila Resources Information Project

Allyson Siwik, Executive Director
Silver City, NM

Grand Canyon Trust

Talia Boyd, Cultural Landscapes Manager
Flagstaff, AZ

Green State Solutions

Mike Carberry, Founder
Iowa City, IA

Greenaction for Health and Environmental Justice

Bradley Angel, Public Lands Policy Director
Moab, UT

GreenLatinos

Angel Peña, Public Lands Director
Washington, DC

Healthy Environment Alliance of Utah

Scott Williams, Executive Director
Salt Lake City, UT

Heart of American Northwest

Peggy Maze Johnson, Board Member
Seattle, WA

Hispanics Enjoying Camping and Hunting and the Outdoors

Kent Salazar, Advisory Board
Albuquerque, NM

Hudson River Sloop Clearwater

Manna Jo Greene, Environmental Action Director
Beacon, NY

Indigenous Rights Center

Peter Clark, Director
Albuquerque, NM

Information Network for Responsible Mining

Jennifer Thurston, Executive Director
Paradox, CO

Laguna Acoma Coalition for a Safe Environment

Petuuche Gilbert, Vice President
Pueblo of Acoma, NM

Los Angeles Alliance for Survival

Jerry Rubin, Director
Santa Monica, CA

Lynn Canal Conservation

Jessica Plachta, Executive Director
Haines, AK

Malach Consulting

Steven Emerman, Owner
Spanish Fork, UT

Manhattan Project for a Nuclear-Free World

Mari Inoue, Co-founder
New York, NY

Native Community Action Council

Ian Zabarte, Secretary
Las Vegas, NV

Nevada Nuclear Waste Task Force

Judy Treichel, Executive Director
Las Vegas, NV

NM Social Justice and Equity Institute

Anna Rondon, Project Director
Gallup, NM

**Northeastern New Mexicans United
Against Nuclear Waste**

Ed and Patty Hughs, Members
Quay County, NM

**Northern Michigan Environmental Action
Council**

Ann Rogers, Chair
Traverse City, MI

Nuclear Age Peace Foundation

Alice Slater, Board Member
New York, NY

Nuclear Energy Information Service

David Kraft, Director
Chicago, IL

**Nuclear Information and Resource
Service**

Tim Judson, Executive Director
Takoma Park, MD

Nuclear Watch New Mexico

Scott Kovac, Research and Operations
Director
Santa Fe, NM

Nuclear Watch South

Joanne Steele, President
Atlanta, GA

Nuestra Tierra Conservation Project

Angel Peña, Executive Director
Las Cruces, NM

Nukewatch

John LaForge and Kelly Lundeen, Co-
Directors
Luck, WI

Okanogan Highlands Alliance

Sarah Kliegman, Co-Executive Director
Tonasket, WA

On Behalf Of Planet Earth

Shelia Parks, Founder
Watertown, MA

Peace Farm

Lon Burnam, Convener
Amarillo, TX

**Portsmouth/Piketon Residents for
Environmental Safety & Security**

Vina Colley, President
Portsmouth, OH

Post 71 Uranium Workers Committee

Linda Evers, President
Milan, NM

Proposition One Committee

Ellen Thomas, Founder
Tryon, NC

Rio Grande Indivisible, NM

Oscar Simpson, Public Lands Chair
Albuquerque, NM

Rio Grande Return

Todd Lopez, Executive Director
Santa Fe, NM

San Luis Obispo Mothers for Peace

Jane Swanson, President
San Luis Obispo, CA

SEED Coalition

Karen Hadden, Executive Director
Austin, TX

Snake River Alliance

Leigh Ford, Executive Director
Boise, ID

**Southwest Research and Information
Center**

Chris Shuey, Director, Uranium Impact
Assessment Program
Albuquerque, NM

**Vermont Yankee Decommissioning
Alliance**

Debra Stoleroff, Steering Committee Chair
Montpelier, VT

Western Watersheds Project

Kelly Fuller, Energy and Minign Campaing
Director
Depoe Bay, OR

**Women's International League for Peace
& Freedom (Detroit Branch)**

Laura Dewey, Coordinator
Detroit, MI

Youth Arts New York/Hibakusha Stories

Robert Croonquist, Founder
New York, NY

Susan Gordon
Multicultural Alliance
for a Safe Environment
sgordon@swuraniumimpacts.org
505-577-8438
www.swuraniumimpacts.org

Keep Uranium In The Ground!