

From: Peter Callen <winged4@comcast.net>
To: <nrcprep@nrc.gov>
Date: Sat, Aug 25, 2007 7:16 PM
Subject: Uranium recovery GEIS

Chief, Rules Review and Directives Branch
Mail Stop T-6D59
U.S. Nuclear Regulatory Commission
Washington, D.C.20555-0001
RE: Uranium Recovery GEIS; Scoping Comments

Dear Sir:

I am responding to the U.S. Nuclear Regulatory Commission's Federal Register notice dated July 24, 2007 regarding the scope of the proposed Generic Environmental Impact Statement ("GEIS") for in situ leach ("ISL") uranium mining. Please note my concerns below.

First, the process by which the NRC arrived at its conclusion to draft a GEIS is fundamentally flawed. There was no public input about whether a GEIS is needed or desirable. Given the site-specific nature of ISL operations, the usefulness of a GEIS is dubious at best. This process gives the impression that drafting a GEIS that would expedite the ISL licensing process was a foregone conclusion. Second, the scoping process itself has been deeply flawed. Only two public meetings have been scheduled on this matter - one in Casper, Wyoming and one in Albuquerque, New Mexico. Additionally, a special meeting with the National Mining Association was held in Washington, D.C. None of these communities is the site of any proposed ISL mining operations. Communities that face proposed ISL mining such as Grants, Gallup, Crownpoint and Church Rock, New Mexico, were ignored. Additionally, the NRC has ignored entire states, such as Utah, Arizona, Colorado and South Dakota, where ISL mining is proposed. The NRC should, at a minimum, extend the comment period and schedule public meetings in communities that will be affected by ISL mining.

Finally, if the NRC has concluded, as it appears to have already done, that a GEIS should be drafted, its scope should be very limited. ISL mining is inherently constrained by site specific considerations. To conclude that the hydrology, water quality, geology, socio-economics, and cultural resources in places as diverse as northwest New Mexico and south Texas - where ISL mining is ongoing and proposed - can be evaluated in a generic manner is absurd on its face.

These issues can only be evaluated on a site specific basis with a site specific environmental impact statement.

Moreover, relegating these important site specific issues to evaluation in an environmental assessment ("EA") is unacceptable. The public participation and environmental analysis requirements under the National Environmental Policy Act are much less stringent for EAs than for EISs. Because the site specific issues are so central to assessing the environmental impact of proposed ISL operations, meaningful public participation and a rigorous environmental analysis are critical. Such issues should not be left for an EA. In

7/24/07
72FR40344
26

RECEIVED

2007 AUG 28 AM 11:48

RULES AND DIRECTIVES
BRANCH
152450

SUNSI Review Complete
Template = ADM-013

E-RIDS = ADM-03
Call = J. Park (JRP)
B. Vontell (RWV)

fact, in the August 13, 2007 issue of the Gallup Independent, the NRC's Office of Federal and State Materials and Environmental Management Programs Branch Chief Gregory Suber stated that "the potential for fewer public meetings is there" with the EA process.

Thank you for the opportunity to submit my comments on this matter, and please keep me apprised of developments with regard to the GEIS.

Sincerely,
Peter Callen

Mail Envelope Properties (46D0B827.EA5 : 18 : 7845)

Subject: Uranium recovery GEIS
Creation Date Sat, Aug 25, 2007 7:15 PM
From: Peter Callen <winged4@comcast.net>

Created By: winged4@comcast.net

Recipients

nrc.gov
TWGWPO01.HQGWDO01
NRCREP

Post Office

TWGWPO01.HQGWDO01

Route

nrc.gov

Files	Size	Date & Time
MESSAGE	3159	Saturday, August 25, 2007 7:15 PM
Part.001	3382	
Mime.822	8041	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled