

NRCREP Resource

From: Spencer, Stephen [Stephen_Spencer@ios.doi.gov]
Sent: Thursday, February 23, 2012 1:42 PM
To: INIS_EIS Resource
Subject: Department of the Interior Comments, DEIS Proposed International Isotopes Flourine Extraction Process and Depleted Uranium Deconversion Plant, Lea County, New Mexico (NUREG-2113)
Attachments: ER12-34.pdf

Please find attached the Department of the Interior comment letter on the subject proposed project. I would appreciate an acknowledgement that this has been received by reply e-mail. Thank you.

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Office of Environmental Policy and Compliance
U.S. Department of the Interior
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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1001 Indian School NW, Suite 348
Albuquerque, New Mexico 87104



ER 12/0034
File 9043.1

February 23, 2012

Chief, Rules, Announcement and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Mail Stop TWB-05-B01M
Washington, D.C. 20555-0001

Dear Sir:

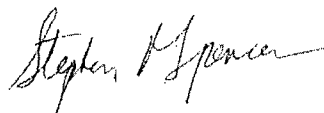
The U.S. Department of the Interior has reviewed the U.S. Nuclear Regulatory Commission's Draft Environmental Impact Statement (DEIS) for the Proposed International Isotopes Fluorine Extraction Process and Depleted Uranium Deconversion Plant in Lea County, New Mexico (NUREG-2113, draft). We offer the following general and specific comments from the DOI Bureau of Land Management for your consideration.

Page	Commentor	Comment
General	Amanda Nisula	The various alternatives and reasonable alternatives do not track through the document. Each alternative analyzed needs to be clearly labeled and numbered and discussed under every section.
General	Amanda Nisula	Without bookmarks, this document is nearly impossible to navigate or switch between pages. Because the numbering of each section starts over, you have to do an incredible amount of addition to guess at what the Adobe page number might be.
General	David Herrell	Wildfire should be addressed. This area sees repeated wildfires that could threaten the safety of the proposed plant.
2-18	Amanda Nisula	Table 2-2 is blank.
2-20	Amanda Nisula	Figure 2-10 is blank.

Page	Commentor	Comment
2-41	Amanda Nisula	It is unclear how the reasonable alternative to process material at Paducah and Piketon differs from the No Action alternative where material would likely be processed at Paducah and Piketon. This leads to confusion through the remainder of the document, including Section 2.7.
2-43	Amanda Nisula	This isn't a comparison of the No Action and the Proposed Action. Instead it is a summary of the impacts of the No Action. There is no comparison or summary of the impacts of the Proposed Action in Chapter 2.
2-48	Amanda Nisula	The reasonable alternative discussed in Section 2.7.2.3 is not discussed in Section 2.4 and it is unclear how it differs from using the Paducah and Portsmouth locations.
Chapter 4	Amanda Nisula	All of the sections identifying impacts from reasonable alternatives are inadequate. The impacts from each reasonable alternative need to be analyzed separately, which require each reasonable alternative to be clearly identified and described, which is lacking in Chapter 2.
4-5	Amanda Nisula	Section 4.1.4.1 isn't a description of the impacts of the No Action on land use. Can't determine if this is a discussion of impacts to the Department of Energy as an organization or impacts to private companies or impacts to public safety?
Chapter 4	Amanda Nisula	The analysis of each of the alternatives (Proposed Action, No Action, various ambiguous reasonable alternatives) should follow the same format and structure.

We appreciate the opportunity to provide comments on this proposed project. If you have any concerns regarding these comments, please coordinate with Amanda Nisula, Planning and Environmental Coordinator, Bureau of Land Management, Carlsbad, New Mexico, at 575-234-5995.

Sincerely,



Stephen R. Spencer
Regional Environmental Officer