

**From:** Ian Ford <ilf@ianford.com>  
**To:** <nrcprep@nrc.gov>  
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**Subject:** GEIS for in-situ leach recovery

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RULES AND DIRECTIVES  
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To the Nuclear Regulatory Commission:

The idea of fast-tracking the EIS process of in-situ leach mining by covering commonalities in one blanket general EIS has dangerous consequences.

The intent is clearly to hasten the approval process, not to protect people from the potentially harmful effects of this type of mining, such as groundwater contamination.

Much of this mining will be on Indian land, and those peoples, being often in poverty and insufficiently educated about the nuclear industry, are not prepared to note deadlines published in the federal register and form a coordinated reaction within the very short times provided for public input. Further "streamlining" the process will further alienate the people whose land is most affected.

Groundwater contamination and other environmental consequences are inherently site-specific, so the idea of generalizing the environmental impact does not seem to be based on scientific grounds, but instead on industry desires.

Performing certain analysis steps once, rather than repeatedly for each application, could be an improvement in safety and cost, if the true intent is to increase safety by pre-approving certain best practices, and normalize procedures and quality control. The fact that the site EIS's would be abbreviated suggests that this is NOT the true intent, and therefore I can only conclude that safety would be lessened by making this rule change, and the NRC would be failing in its mission.

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