

7/24/07
72FR 40344

From: "Dr. Dorothy K. Cinquemani" <dorotea@earthlink.net>
To: <nrcprep@nrc.gov>
Date: Wed, Aug 29, 2007 7:36 PM
Subject: Uranium Recovery GEIS

261

RECEIVED

2007 SEP - 7 PM 1:34

RULES AND DIRECTIVES
BRANCH
(60470)

To Whom It May Concern:

I wish to respond 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.

I most strongly oppose a GEIS for many reasons, among them are

1. 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 indelensible.

This process gives the impression that drafting a GEIS that would expedite the ISL licensing process was a foregone conclusion.

2. The scoping process itself is 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 the very least, extend the comment period and schedule public meetings in communities that will be affected by ISL mining.

3. 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 should be 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, at best, absurd on its face.

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

Clearly, 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.

SUNSI Review Complete
Template = ADM-013

E-REDS = ADM-03
Add = J. Park (JRP)
B. VonTiel (RWR)

As the site specific issues are so central to adequately assessing the environmental impact of proposed ISL operations, meaningful public participation and a rigorous environmental analysis are essential.

Such issues should not be left for an EA. In 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,

Dr. Dorothy K. Cinquemani
MPC member
400 Lake Ave NE
S210
Largo, FL 33771-1684

Mail Envelope Properties (46D602EF.8C8 : 21 : 39112)

Subject: Uranium Recovery GEIS
Creation Date Wed, Aug 29, 2007 7:36 PM
From: "Dr. Dorothy K. Cinquemani" <dorotea@earthlink.net>

Created By: dorotea@earthlink.net

Recipients

nrc.gov

TWGWPO01.HQGWDO01

NRCREP

Post Office

TWGWPO01.HQGWDO01

Route

nrc.gov

Files	Size	Date & Time
MESSAGE	3132	Wednesday, August 29, 2007 7:36 PM
Mime.822	4389	

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