

# PUBLIC SUBMISSION

As of: 6/23/15 3:30 PM  
 Received: June 18, 2015  
 Status: Pending\_Post  
 Tracking No. 1jz-8jhp-p5od  
 Comments Due: June 18, 2015  
 Submission Type: Web

**Docket:** NRC-2014-0178

Standard Review Plan for Conventional Uranium Mill Heap Leach Facilities

**Comment On:** NRC-2014-0178-0005

Standard Review Plan for Conventional Uranium Mills and Heap Leach Facilities; Reopening of Public Comment Period

**Document:** NRC-2014-0178-DRAFT-0009

Comment on FR Doc # 2015-08797

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## General Comment

Ms. Annette Vietti-Cook

Secretary

Nuclear Regulatory Commission

Re: Docket ID NRC-2014-0178

June 17, 2015

Dear Ms. Vietti-Cook:

I submit these comments as an officer of a local environmental group, a scientist, and an chemical engineer with lead responsibilities for installing a new technically complex chemical manufacturing plant with zero impacts on our natural resources and environment. These comments were submitted to the National Academies of Science subcommittee studying uranium mining in Virginia, February 2011, but were omitted from their final report. They are commonplace in the chemical industry in Europe and resulted in a change a culture of permissiveness to protect both people and natural resources.

Uranium Tailings storage and management

Mismanagement of the tailings waste on a 24/7 365 day basis from ~5000 uranium mines in the USA, resulted in 33 superfund sites.

12/18/2014  
 79 FR 75597

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ERDS = ADM-03  
 Add = D.I. Mendenhall (dtrm4)  
 SUNST Review Complete  
 Template = ADM-013

Professor Doug Brugge, Ph.D., M.S. (Professor of Public Health & Community Medicine, Tufts University, School of Medicine) studied the impacts of the massive tailings release at Church Rock in 1979. His conclusions that the "chemical toxicity of uranium is the primary environmental health hazard with the radioactivity of the uranium is of secondary concern? [Rev. Environ Health 2011; 26(4):231-249]

Lizabeth Rogers, Rogers Entertainment Group, published a movie Hot Water to document the effects of uranium mining tailings on people downstream. See <http://www.regrouppfilms.com> and <http://www.zerohotwater.com>.

The standards of waste tailings design do not provide adequate protection to public health on a 24 hours/day, 7 days per week, 365 days per year because of the exceptions to the clean water act built into the regulation due to bad weather and other causes of superfund sites from uranium tailings. [Ref. 40 CFR Part 192 Appendix A]

The goal for the regulations should be those stated in the California Public Health Goals (PHG) for uranium which are set at levels at which no known or anticipated adverse effects in health will occur, with an adequate margin of safety. The PHG for uranium is 0.3 ppb (0.3 g/L as measured by ICP-MS as in EPA method SW846 3005A/6020A).

By contrast current standards for uranium in waters of the USA are 30 ppb; for Canada = 20 ppb; and for World Health Organization (WHO) = 10 ppb. None of these standards are enforced when unlimited amounts of uranium is released during storms and other bad weather.

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Hands Across the Lake is a community based organization that tries to achieve win-win scenarios for business and the environment.