



## CRAWFORD SCHOOLS

908 FIFTH STREET  
CRAWFORD, NE 69339

FAX TO: Office of Secretary

ATTENTION: Rulesmaking & Adjudications Staff

DATE: 8/27/15 PHONE #: 301-415-1101

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FROM: Richard Tiedter - Superintendent of  
Schools

MESSAGE: \_\_\_\_\_

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## CRAWFORD PUBLIC SCHOOLS

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August 25, 2015  
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To Whom It May Concern:

I am Richard Taedter and I serve as the Superintendent of Schools for Crawford Nebraska. I wish to speak in support of the CAMECO Crow Butte Uranium Mine and in opposition to the EPA's proposed involvement in ground water monitoring which is to last for decades for in situ uranium mines.

Let me make it very clear that I am not opposed to parameters, regulations, and monitoring to ensure an in situ uranium mine operates in a safe and effective manner. In fact, it is my understanding that one of the main purposes of the Nuclear Regulatory Commission, the NRC, is to protect the environment and to ensure public safety – and this includes monitoring of underground water aquifers.

In addition, it is my understanding the Nebraska Department of Educational Quality, the NDEQ, functions in a similar manner, albeit at the state level, as the federal nuclear regulatory commission. Thus a federal agency, the NRC, and a state agency, the NDEQ, both have responsibility and accountability to ensure safety protocols exist, are utilized, and safety parameters meet strict compliance regulations.

Should the EPA become involved, this would constitute a federal agency working over another federal agency, the NRC, and a state agency, the NDEQ. This is a great example of an inversely proportionate situation; by this I mean the more federal and state entities involved, the less effective the oversight. Some people wrongly believe more oversight is synonymous with better oversight. I respectfully disagree for when two agencies share oversight duties, the opportunity for both of them to grow lax increases. A possible scenario might see Agency A thought Agency B was monitoring a specific area and Agency B thought Agency A was monitoring this same area so, as a result, no monitoring existed at all. This dual monitoring creates a gap and it is simply a matter of when not if a problem occurs. Furthermore, this duplicity in oversight lessens accountability. Should something problematic occur, the NRC points its finger at the EPA and the EPA points its finger at the NRC. However, if one federal agency is fully and solely in charge, no gaps in monitoring exist and, as a result, this agency is fully accountable. To summarize, monitoring quality and accountability are compromised when duplicity in coverage exists.



Allow me to address this topic from my position as a resident of Crawford who serves as the Superintendent of Schools. CAMECO has a spotless safety record which extends back over 20 years. CAMECO's operation constitutes 30% of the Crawford tax base so CAMECO's presence has a significant impact upon both the town and school district funding. And many spouses and/or parents of my students are employed by CAMECO.

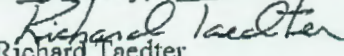
In addition, CAMECO has donated several thousands of dollars in equipment to Crawford Public Schools, significantly contributed to the town of Crawford via the construction of a park pavilion and assisting with the fire department. The local business generated either directly or indirectly from the Crow Butte operation significantly impacts every aspect of Crawford and its school system.

An aspect I deal with as a school superintendent is standardized testing; allow me to use standardized testing as an analogy to the topic at hand. Each spring students in Nebraska take the Nebraska State Achievement Test (NeSA) and this data largely determines, rightly or wrongly, how a district, a school, and each student are performing. This assessment process is monitored by the Nebraska Department of Education which is overseen, in some ways, by the U.S. Department of Education. This is a clean direct system – local monitored by state with minimal federal oversight.

Suppose another federal agency should decide to enter the educational picture, and as a result, another set of tests are now required to be completed by our students; tests that largely assess the same facts, concepts, and skills as the current test. This duplicity in testing is asinine and is a waste of instructional time and taxpayer money. So too is the duplicity in monitoring ground water for in site uranium mines.

I turned 50 last fall and for decades I have listened to politicians and presidential candidates use smaller government as a platform. And instead of smaller more effective and more efficient government we have created the opposite – a bureaucratic mess that grows thicker and stickier each year. I support federal oversight. I do not support duplicity of federal oversight. The EPA's involvement in an area already well regulated and monitored by the NRC is a problem looking for a solution. As both a Crawford resident and employee, I am opposed to the proposed involvement of the EPA in this matter.

Respectfully,

  
Richard Taedter

Superintendent of Schools  
Crawford Resident