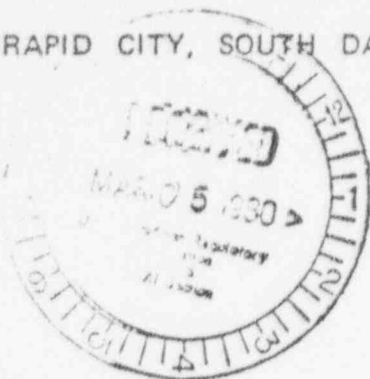


BLACK HILLS ALLIANCE

BOX 2508 RAPID CITY, SOUTH DAKOTA 57709 605-342-5127



February 25, 1980



D.M. Gillen
U.S. Nuclear Regulatory Commission
Division of Waste Management, 483-SS
Washington, D.C. 20555

Dear Mr./Ms. Gillen:

This letter constitutes the Black Hills Alliance's written comments concerning the scope of the proposed Draft Environmental Impact Statement (DEIS) regarding renewal of Federal American Partners uranium mill license, SUA 667, Docket No. 40-4492, Gas Hills Mining District, Fremont Co., Wyoming.

The scoping notice (45 Federal Register 4487) states that "Federal American Partner's proposed plans call for the expansion of the mill process capacity from 860 metric tons of ore (950 short tons) per day to 2,680 metric tons of ore (2,950 short tons) per day..."

This is an increase in capacity of 2,000 short tons per day, or over 200%.

One thing is absolutely clear with respect to this tremendous increase in capacity: the ore will have to come from somewhere. Presumably, Federal American Partners knows where this ore will come from. FAP therefore knows:

1. what area will be the subject of major surface disturbance from mining;
2. what streams will bear significant additional sediment and pollution loads from mining;
3. what airsheds will be subject to additional pollutant loads from mining;
4. what highways, and what communities, will be subject to additional traffic of 100 or more ore trucks daily;
5. what communities will suffer the increased demand for housing, electric and gas utilities, schools, and other services necessary to serve the increased numbers of mine and transportation employees, their dependents, and associated other population growth;
6. what radiological impacts to humans, plants and animals will result from



Received WNR
FEB 25 1980

FEE EXEMPT 15352

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D.M. Gillen
Feb. 25, 1980
Page Two
RE: Federal American Partners license renewal

the increased mining and transportation of ore, and

7. What effect will mine dewatering have on area wells, underground and surface water systems.

Milling has no utility apart from mining. Mills cannot operate without ore.

Any complete assessment of the environmental impacts of the mill expansion therefore must include the integrally related effects of mining and transportation of ore.

It will not do for this analysis to be perfunctory or superficial. At a minimum, the following questions should be addressed:

1. Where will the increased ore supply come from?
2. What new mines will be opened to supply the expanded mill?
3. What existing mines will be expanded?
4. What amount of additional surface disturbance will take place at these mine sites?
5. What will the air quality impacts, both radiological and non-radiological, of the increased mining be?
6. How will increased mining operations affect water quantity and quality of area wells?
7. How will increased mining operations affect the quantity and quality of both surface and underground water systems?
8. What highways will be used for trucking ore? What is their capacity? Are they built to a high enough standard to withstand this additional traffic?
9. How much additional electricity/natural gas will the expanded mill use? How much additional electricity/natural gas will the expanded mining operations use? How much electricity/natural gas will the residential and commercial development associated with this growth use? What utilities will supply this service? Do they have excess capacity? What new facilities must they construct? How much will this cost ratepayers?
10. What additional agricultural land will be used for increased industrial and commercial development?

D.M. Gillen
Feb. 25, 1980
Page Three
RE: Federal American Partners license renewal

11. What will the socio/economic impacts be on area communities affected by the increased mining activities?

12. What will the radiological impacts on human, plant, and animal (both wildlife and livestock) life be?

Also, in light of the fact that there are three other uranium mills, numerous mines, and heap leaching operations within a 30 mile radius of the FAP mill, the cumulative radiological, air quality, water quantity and quality, socioeconomic and other impacts must be assessed. It is ridiculous, for example, to go to great lengths to calculate radiation exposure to offsite individuals for single mills when it is obvious that there are many mills, mines and uranium operations in the area.

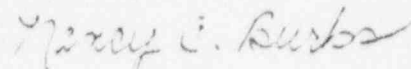
The DEIS on the Gas Hills (Union Carbide) mill indicates EPA standards (40 CFR 190) will in one instance be exceeded by a factor of three. (p. 4-13)

The DEIS on the Split Rock Mill, only 25-30 miles away, projects compliance with EPA standards "by a very slim margin." (p. 4-19)

We have not even begun to consider radiological impacts from the Utah International Mill, from the heap leaching operations in the area or from the many local mines. The cumulative impact of all these sources may be very great. This DEIS must consider them.

We hope that the NRC will find these comments useful.

Sincerely yours,



Nancy C. Burks
Research & Documentation Dept.