

Generic Environmental Impact Statement (GEIS) for *In Situ* Leach Uranium Milling Facilities

The National Mining Association (NMA) commends the Nuclear Regulatory Commission (NRC) for finalization of the GEIS. The GEIS will serve as a useful tool for NRC, states, licensees, and the public at large in evaluating the environmental impacts of *in situ* recovery (ISR) projects. Over the past few years, it has become increasingly clear that the vast majority of license applications for uranium recovery projects will be for ISR projects. Given NRC's resource constraints, expeditious review of these applications can only be achieved through an efficient licensing process facilitated by the GEIS. During the scoping period, NMA submitted a 700 page reference document to provide NRC with the over thirty years of ISR uranium recovery industry data and analyses needed to prepare the GEIS.

At a time when energy costs are rising and all available sources of energy must be utilized to meet increased demand, making the licensing process for uranium recovery more efficient, while at the same time protecting public health, safety and the environment, is simply good public policy.

- The GEIS will promote the availability of domestic sources of uranium:
 - to fuel our nation's nuclear reactors, which currently provide nearly 20 percent of our energy needs; and
 - will lessen our reliance on foreign sources of uranium from Russia, Canada and Khazackstan.
- The GEIS was developed in a two year open process that provided ample opportunity for public input:
 - extensive scoping;
 - 13 public meetings;
 - participation by state, tribal and federal agencies; and
 - thousands of comments from interested parties.
- The GEIS will promote efficient use of NRC resources to:
 - allow NRC to focus on the site-specific aspects of a proposed ISR project without expending unnecessary time and resources to "re-invent the wheel" by assessing issues that have already been assessed.
- The GEIS will not preclude consideration of site-specific environmental impacts that were not considered in the GEIS.
 - NRC is required to evaluate site-specific circumstances and potential impacts that differ significantly from the ISR GEIS' evaluations and conclusions.
 - The public will have opportunities to be involved in site-specific analyses.
- The GEIS confirms the low risk nature of ISR activities:
 - indicates the majority of potential impacts are "small;"
 - explains that all groundwater in an ISR uranium recovery zone is exempted from consideration as a source of drinking water by the Environmental Protection Agency because it is unsuitable for human consumption as a drinking water source both before and after uranium recovery operations occur;
 - describes the groundwater restoration that is required to protect adjacent non-exempt waters; and
 - explains that in ISR mining, non-toxic leaching agents, such as oxygen with sodium carbonate, are injected through wells into the ore body to dissolve the uranium.