

RECEIVED

2014 MAR 11 PM 12:18

Rules and Directives
Branch
USNRC

2/4/104
69FR 5374
32

To: Nuclear Regulatory Commission
Subject: LES/NEF Eunice NM
From: Rose M. Gardner

I would like to extend our welcome and thanks to NRC for this meeting tonight so that issues regarding the proposed uranium enrichment plant may be addressed by your organization. I am thankful that this procedure is in place regarding licensing of nuclear related projects.

The first topic I would like to address are the present road conditions of some of our New Mexico roadways. The small 2 lane road that leads to the plant is in very deteriorating condition at the present, there is daily oilfield related traffic on the road as well as being the only road leading to the county landfill and the waste depository known as Waste Control. I have lived in Eunice for 42 out of 46 years and as long as I can remember there have been numerous accidents both on highway 18 that leads to the area and also on the Texas highway towards Andrews Tx.. There were different reasons for these accidents but nevertheless they are an important issue because some have involved fatalities. I use that road quite often because ~~my~~ I go to Odessa frequently to get supplies for my work. I have family in Andrews and Odessa, as well as shopping and family recreational activities and medical facilities. My husband travels the same road every day as he reports to work outside of Seminole Tx. Due to the increased amount construction related traffic, and then after that, the transport of containers of uranium ore and enriched uranium, I feel that these are definitely safety related issues that need to be addressed and how this will impact our daily lives for the future. We also get traffic from Texas that passes through Eunice on their way to our popular recreation areas in Carlsbad, as well as the Sacramento Mountains including Cloudcroft and Ruidoso. Some of these good people do stop in Eunice to eat or gas up so we owe it to them to check out the traffic and roadway safety aspects.

The second topic is concerning storage container safety and the yet unresolved disposition of future waste that will be generated by the manufacturing process. I would definitely like to see this decades long waste storage problem dealt with, in a timely and efficient manner. We know about the 700,000 tons of waste sitting at Paducah Ky as well as other manufacturing sites. Not having a solid or definitive plan for the waste is not acceptable to me. We must not add to our already burgeoning amount of radioactive waste pollution. Even though there are proposed plans for the US government to build in the future some deconversion facilities, the waste that has been generated for the last 50 years must take precedence over the newer generated waste. Some estimates are that it could take 50-70 years to complete the deconversion of the waste in the US now. Where does that leave Eunice, 30 to 50 years of waste on site as well? I truly hope not. I also understand that LES has a tentative agreement with a private deconversion company that is from Europe but no definite contract or agreement. Am I to understand and accept that this facility would work exclusively for LES. There is much waste in the US now why would this company only want to deal with NM waste? Also no waste would be left at the plant after decommissioning. What assurances do we have that it won't just be deconverted and stored right next door at Waste Control. This corner of NM is well

E-RIDS = ADM-03
Call = T. Johnson (TEJ)
M. Wong (M.W.)

Template = ADM-013

known for waste collection, are we just to add more waste to our repertoire? I find that unacceptable.

The third point that I like to discuss is the safety issue involving the open contamination water pit that will be on site. It was described as having balls and netting to protect wildlife from getting into the water. This slows the evaporation process as well as brings up the point of what happens if we get some heavy rains and the pit over flows, will it contaminate the soil around it? Can the water be contained at all? The construction of the pit is of interest as well, what type of liner can be used that will not leak and is so resistant to external conditions that we are assured of no soil and underwater contamination? There will be emissions from the plant that could possibly be harmful to the water, soil and humans as well as livestock in the area, certainly these are to be monitored but if high levels of contamination are found are there enough precautions in place to assure that no one will be hurt or get sick?

The water resources available to Eunice are very limited, since our main water resource is the Ogallala Aquifer I am concerned about the misleading figures I have come across regarding the amount the plant will use and how it compares to golf course usage and even how much water a family unit might use. LES claims on their web site that it will use 75 acre feet of water per year about the same as a neighborhood of 210 homes or 18 hole golf course. In an ad recently in the Hobbs New Sun it compared water usage to Eunice Golf Course (9holes) and uses 210 acre ft per year and Hobbs Golf Course (18 holes) uses 283 acre ft per year. As you can see I am a little confused about these numbers. I do not believe that the 40 year water study performed in 1999 and 2000 for Eunice and Lea County took into account a swell in population over the next 30 years for growth of approximately 70,000 people, as LES pointed out in recent article on how Almelo, Netherlands grew from a small farming community to a city of 70,000. Is our aquifer able to sustain not just plant usage of water for approximately 30 years, but an increase of population that is 2 times the amount of our bigger neighbor Hobbs? I believe that this is a very important issue that needs to be addressed. The surrounding communities as well as other New Mexico counties are depending on the same water which comes from a non-replenishing aquifer. A news release dated June 12 2003 by USDA states "The search for solutions to the declining water level in the Ogallala Aquifer recently gained momentum with the introduction of the "High Plains Aquifer Hydrogeologic Characterization Mapping, Modeling and Monitoring Act" by Senator Jeff Bingaman. This legislation seeks to extend the life of the Ogallala by setting up the frame work needed to work toward long term solutions to reduce the rate at which water from the aquifer is being mined." It goes on to say "How long the precious water of the Ogallala Aquifer will last is not known. Therefore, conservation is critical. Solutions must be sought and alternatives explored."

Has Lea County and the City of Eunice completed all the recommendations and suggestions made by the engineers that performed these studies? Some suggestions regarding water storage and the drilling and acquisition of additional wells have not been addressed by the City of Eunice as of yet. Again, these recommendations were made before this plant was even in the picture.

The final issue that I would like to address is the valuation or devaluation of properties in Eunice. As a landowner with 4 houses and 2 small businesses I am concerned about the values of these properties. If there should be a problem at the plant and contamination of land, or water occurs, how is that going to affect me? Will my property value go down? If the value goes down and I decide to abandon my hometown for a new and safer place to live, who would want to buy my properties? I would think that I'd have to take a loss on all that I have. Frankly, this is not acceptable to me since at this point in time there is no plant, there is no radiation problem, there are no radiation emissions vented to the air.

The recent information disclosed about possible international industrial espionage and intrigue on the part of a former Urenco scientist also gives one reason to pause and reflect on the possible consequences that do not show up for many years and how all of it could possibly impact our state and national security.

In closing, I would like to ask that you, as members of the NRC to **deny**, once again, the license application to Urenco LES/NEF.

A handwritten signature in cursive script, appearing to read "Rose Gault". The signature is written in black ink and is positioned below the main body of text.