From:	BADER Sven (AREVA)
To:	Faraz, Yawar
Cc:	Guttmann, Jack; Matula, Thomas; DAVIDSON Dorothy (AREVA); JONES David (AREVA); MURRAY Paul (AREVA); SALAS Pedro (AREVA); LEVIN Alan (AREVA); LUCAS Matthieu (AREVA); BAILLY Frederic (AREVA); PRUD HOMME Pascal (AREVA)
Subject:	RE: Request for input for Commission paper on reprocessing
Date:	Tuesday, October 23, 2012 5:32:25 PM

Yawar,
You may publicly release the below text.

Sven

NRC:
As you may have heard, an AREVA-led team recently was selected by the Eddy Lea Energy Alliance (ELEA) as their commercial partner to begin developing the concept of a Used Nuclear Fuel (UNF) Consolidated Storage Facility (CSF) in southeastern New Mexico. AREVA has spoken to other communities that may come forward in the future to offer hosting a CSF, but what our agreement with ELEA ultimately indicates is AREVA's belief that consolidated interim storage of UNF (as recommend by the Blue Ribbon Commission on America's Nuclear Future) will be an important first step in moving towards a resolution of issues associated with the back-end of the nuclear fuel cycle in the U.S. However, a CSF by itself does not accomplish an end goal (e.g., Waste Confidence). If a CSF were combined with recycling and ultimately with a repository, then there is an assurance to any State and local community willing to "consent" to host a CSF that the CSF will not become a de facto repository for UNF. So why does AREVA include recycling in this scheme? Because AREVA sees many common elements between a CSF and a recycling facility (e.g., a receipt facility for UNF, a temporary storage location for UNF, and potentially dry and/or wet UNF transfer areas and an R&D facility) and AREVA believes that a recycling facility would also provide multiple benefits to a repository (e.g., providing a stable waste form ready for disposal in most media and reducing the ultimate volume of waste requiring disposal). Furthermore, AREVA believes (unless Yucca Mountain is restarted) that the horizon for a repository in the U.S. (based on historical evidence) is likely much further out than that for a recycling facility. Hence a recycling facility could incentivize the nearer term movement towards a back-end solution through the added benefits of providing a local community willing to host such a facility significant economic development and job creation (well beyond those associated with just a CSF), while waiting for the siting studies, selection process, licensing process, and design and building processes of a repository to mature. These are only a few reasons why AREVA supports recycling and we would welcome the opportunity to share others with you.

AREVA's plan is to submit a license application for a recycling facility in 2019. To meet this date, AREVA will require rulemaking for a recycling/reprocessing facility to be completed in the 2017 to early 2018 timeframe. AREVA remains committed to supporting the NRC recycling rulemaking activities, which we believe have shown significant progress over the last year (with the release of the draft Regulatory Basis, the responding SRM from the Commissioners, and the recent release of the ETR). AREVA understands the constraints the NRC is under (considering budget limitations and

issues associated with Waste Confidence and lessons learned from Fukushima), but we believe the progress shown to date, even with the limited resources available to the Staff, does show meaningful progress towards a final rule and AREVA supports the NRC's continued effort towards completing this rulemaking activity.

Please do not hesitate to contact me for further elaboration on this matter or, if you would like, AREVA could meet with you to discuss this topic further. We hope that the NRC continues its effort on this rulemaking activity and thank you for your continued progress on this activity.

Sincerely,
Sven

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