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Angelina S. Howard

Rules and Directives
Branch
USNRC
EXECUTIVE VICE PRESIDENT

August 23, 2001

Mr. Michael T. Lesar, Chief
Rules and Directives Branch
Division of Administrative Services
MS T6-D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Docket No. 50-186
University of Missouri-Columbia,
University of Missouri-Columbia Research Reactor;
Request for Public Comment (*Federal Register* August 1, 2001)

Dear Mr. Lesar:

The Nuclear Energy Institute (NEI)¹ supports the University of Missouri-Columbia's license amendment request to recapture the reactor's construction period, which would change the expiration date of the University's Research Reactor (MURR) from November 21, 2001 to October 11, 2006.

The Nuclear Regulatory Commission (NRC) has noted that there is no significant impact to the license extension. NEI believes there are significant benefits to the continued operation of the MURR for research and the production of radioisotopes. MURR has made significant contributions to the fight against cancer by producing radioisotopes that can target and destroy cancer cells without seriously damaging healthy cells. Researchers with the University and MURR have developed and commercialized three novel radiopharmaceuticals, QuadrametTM, CeretecTM and ThereasphereTM. MURR is also a preeminent supplier of radioisotopes for research and clinical applications. MURR routinely ships radioisotopes to research, medical institutions and private companies around the world. Each year, over 200,000 cancer patients depend on MURR for the radiopharmaceuticals used to treat their

¹The Nuclear Energy Institute (NEI) develops public policy for the U.S. nuclear industry. We represent 270 member companies with a broad spectrum of interests, including every U.S. utility that operates a nuclear power plant, their suppliers, fuel fabrication facilities, architectural and engineering firms, labor unions and law firms, radiopharmaceutical companies, research laboratories, universities and international nuclear organizations.

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Mr. Michael T. Lesar

August 23, 2001

Page 2

cancer and provide pain relief. Without MURR-produced radioisotopes, many patients will be denied treatment options.

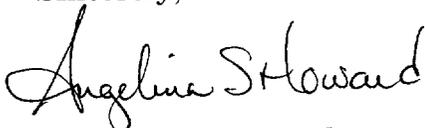
MURR's educational role is also important. Now more than ever, there is a demand for a solid nuclear engineering education and research infrastructure at U.S. colleges and universities. As the highest power university research reactor in this country, MURR provides a wide range of research and training opportunities for graduate and undergraduate students. Additionally, the MURR supports research in other fields including life sciences, chemistry, archaeology and veterinary medicine.

The proposed amendment will not result in a significant increase in environmental impacts or impacts to human health or the environment. No changes will be made to the facility design or operating conditions as part of this amendment process. Further, possible doses to an individual member of the public are well within regulatory limits.

Nearly all of the eligible commercial nuclear power plants have extended their licenses by recapturing the construction period. U.S. nuclear reactors are licensed to operate for 40 years. Congress in the Atomic Energy Act of 1954 selected a 40-year term for nuclear reactors because this was a typical amortization period for an electric power plant. The 40-year license period was not based on safety, technical or environmental factors. In fact, the NRC has already approved renewal applications for six commercial reactors extending their operating licenses for an additional 20 years.

In conclusion, there are no significant impacts on the environment, and there would be the loss of considerable benefits if the extension were not granted. Therefore, NEI fully supports the continued operation of MURR. If you have any questions or would like to discuss our comments, please contact me.

Sincerely,



Angelina S. Howard

c: Chancellor Richard Wallace, University of Missouri
Dr. William H. Miller, University of Missouri
Mr. Ralph A. Butler, University of Missouri