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Please ask  
Steve who

OIP#  
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Thanks  
JO

AUTHOR:

Tom Clements

AFFILIATION:

MA

ADDRESSEE:

Annette Vietti-Cook

SUBJECT:

Opposition to shipment of LSDs to aid Rokkasho plutonium proliferation factory

ACTION:

Direct Reply

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RF, RAS, OGC...SECY to Ack

LETTER DATE:

03/21/2008

ACKNOWLEDGED

No

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OIP/OGC.....Made publicly available in ADAMS via OIP/DPC

NOTES:

OIP...should coordinate response with OGC

FILE LOCATION:

ADAMS

DATE DUE:

04/22/2008

DATE SIGNED:



March 21, 2008

Annette L. Vietti-Cook  
Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Mail Stop O-16G4  
Washington, DC 20555-0001

**Opposition to Shipment of LSDs to Aid Rokkasho Plutonium Proliferation Factory**

Dear Ms. Vietti-Cook:

I am writing to oppose issuance of a license for the proposed export of weapons-grade uranium (highly enriched uranium, HEU) by the Department of Energy's New Brunswick Laboratory in Argonne, Illinois to the Rokkasho plutonium reprocessing plant in Japan. Thus, please let the record show my opposition to the granting of license number XSNM3485.

The shipment and use of 240 grams of HEU in the Japan Nuclear Fuel Ltd's Rokkasho reprocessing plant does not in and of itself pose a proliferation risk. But the use of the material in the reprocessing facility in the form of HEU "large size dried spikes" (LSDs) "in establishing accountancy values for uranium and plutonium in input and output streams" aids in the continued separation and stock-piling of weapons-usable plutonium in Japan and thus plays a role in that facility's on-going proliferation risk.

According to Japan's reporting to the International Atomic Energy Agency (IAEA) Information Circular 549, as of December 31, 2006, Japan held over 6 metric tons of weapons-usable plutonium domestically and over 25 metric tons of plutonium at the reprocessing plants in the United Kingdom and France. Operation of Rokkasho will only add to this massive amount of plutonium, which has little possibility of ever being used as plutonium fuel.

The license application also mentions that U.S.-origin HEU would also be used in the J-MOX facility when it is completed in 2010. That facility would be involved in the direct introduction of weapons-usable into commerce, thus presenting a new set of risks in handling, transport and use.

Although the export license application seems to acknowledge the benefits of International Atomic Energy Agency (IAEA) safeguards that are applied at Rokkasho, it is those very safeguards which have given blessing to a facility which is ostensibly a plutonium proliferation factory.

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U.S. policy should be not to encourage any country to continue to stockpile weapons-usable plutonium but failure to implement such a policy is made clear in respect to Japan and a few other countries which persist in reprocessing. U.S. leadership towards a Comprehensive Fissile Material Cut-Off would insure that weapons-usable plutonium is no longer separated, stockpiled or introduced into commerce.

Given the proliferation risks associated with Rokkasho and the bad example it sets for the rest of the world, that the U.S. is still cooperating in any phase of this facilities operation raises concerns and undermines U.S. non-proliferation policy. Any cooperation I operation of Rokkasho, including shipment of the HEU under consideration, must be terminated.

While it appears that some HEU in the form of LSDs was shipped to Rokkasho in the past, the matter of continued U.S. support and involvement in Rokkasho operations must be reviewed and analyzed. Toward that end, I thus request that this license application be noticed in the Federal Register and that public comments on it be solicited. I further request that the Senate Foreign Relations Committee and the House Foreign Affairs Committee be notified about this proposed export and their comments on it be solicited.

Thank you for your response to this letter and to the requests in it. Please respond to the address below.

Sincerely,



Tom Clements  
Southeast Nuclear Campaign Coordinator  
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Columbia, SC 29205  
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