



MIT NUCLEAR REACTOR LABORATORY

AN MIT INTERDEPARTMENTAL CENTER

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Secretary
U.S. Nuclear Regulatory Commission
Washington DC 20555-001

Attention: Rulemaking and Adjudications Staff

Re: PRM-50-90: Comments on Natural Resources Defense Council Petition to Ban Future Use of Highly Enriched Uranium

Dear Sir or Madam:

The Nuclear Reactor Laboratory of the Massachusetts Institute of Technology wishes to provide comment on the above referenced petition. This letter replaces in its entirety the letter sent by MIT on August 5, 2008. The MIT NRL position on HEU conversion is that we strongly favor doing so for civilian reactors as soon as technically achievable. We are working actively and cooperatively in the re-energized DOE program to develop the new high-density LEU fuel required for the MIT Reactor. We agree with the concept of establishing a formal timeline for HEU conversion of the MITR, in concurrence with the DOE. We recognize that unknown R&D challenges may be encountered in this process which could alter the timeline, and therefore urge NRC to take this into account in any revised regulation.

Sincerely,



David E. Moncton

DEM/koc

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