





# Friends of the Earth

March 21, 2008

The Honorable Dale Klein  
Chairman  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
One White Flint North  
Rockville, MD 20852

Dear Chairman Klein:

I am writing to you regarding a speech you presented on February 27, entitled "Waste Confidence and Waste Challenges: Managing Radioactive Materials."

I was quite surprised at something erroneous that you said in your speech and just wanted to point that out and get an explanation for you as to why you would have said something which isn't accurate. I view the errors in your speech to be significant and the record needs to be corrected.

In the speech you state that: "Re-using and recycling fuel to minimize the amount of waste requiring final disposition seems to be the approach chosen by most nuclear nations. This is not, of course, the path currently being taken by the United States. But rather than pushing the challenge of large volumes of waste off to the future, I think that the next generation of American nuclear scientists and engineers will be more open to the role of advanced and innovative nuclear technologies."

As I'm sure you are aware, while a very few countries have reprocessing facilities and other countries have shipped spent fuel to those countries for reprocessing, the majority of countries with nuclear power reactors have either never been involved in reprocessing or have halted shipment of spent fuel to the reprocessing plants. Additionally, only a very few Western European countries are actually using plutonium separated at the reprocessing plants, in the form of plutonium fuel, and that use is being done reluctantly as the cost of reprocessing and plutonium fuel has proved to add extra costs to operations. And, the volume of waste arising from reprocessing is much larger than the volume of spent fuel which may be reprocessed.

Several countries which have reprocessing plants, primarily the United Kingdom and Russia, do not use plutonium fuel in spite of the vast stockpiles of weapons-usable plutonium that they have accumulated. Likewise, as I know you must be aware, there is a massive stockpile of reprocessed uranium (RepU) and it appears that only a small percentage of this might be reused in France (or is it really being swapped for fresh Russian uranium?). Essentially, the RepU is now waste. In short, there are no plans for any form of reuse of much of either the existing plutonium stockpiles or the RepU stockpiles, further revealing that the term "recycling" when

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used when referring to reprocessing is highly inaccurate. If what I say here is inaccurate I ask that you please correct me.

Additionally, it is worth noting that reprocessing is either carried out via state subsidies or via the larger costs (than fresh fuel) that are passed on to the rate payers. The reprocessing industry could simply not survive in a free market and such will prove to be the case in the U.S. In France, the state-owned and state-supported company Areva could not continue to operate the la Hague reprocessing plant if its reluctant customer, EdF, was not forced to take the plutonium off its hands. EdF places no positive value on the plutonium it is forced to use and would opt for fresh uranium if the state were not protecting the reprocessing industry. We'll see if EdF can get out of the reprocessing business, as it apparently would prefer to do.

Your statement, while inaccurate, also appears to present a bias in favor of reprocessing in the U.S., which is being considered under the Global Nuclear Energy Partnership (GNEP). Given the lack of private support for GNEP, the huge cost to the tax payer and the numerous technical flaws of the plan, it is questionable if that this troubled program will survive beyond the current Congress. If you can present evidence that private industry is interested in funding reprocessing or fast reactors this would be important for us all to know. In your role as NRC Commissioner, I urge you to refrain from promoting the highly dubious GNEP reprocessing program.

While you have the right to speak about reprocessing, I request that you or your staff get the facts straight and that you refrain from presenting a biased view about a program which may well end up damaging the nuclear industry if it is pursued further. It has proved a blessing that the U.S. terminated its flirtation with reprocessing and thus avoided the environmental, proliferation and cost problems that face the countries which went down that path.

Thank you very much for clarifying the accuracy and intention of what you said in your remarks.

In responding to this message please use the address below rather than the address of our office in Washington:

Sincerely,



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