From: Pomper, Miles A [mpomper@exchange.miis.edu]
Sent: Wednesday, September 30, 2009 4:45 PM
To: GLE_EIS Resource
Subject: Comment on General Electric-Hitachi Global Laser Enrichment (GLE) Laser Enrichment Facility EIS
Attachments: Nuclear power, disarmament and technological restraint.pdf; NRClaserenrichmentdraftSept30-2.doc

September 30, 2009

Nuclear Regulatory Commission
Washington, DC

Dear Members of the Commission:

We believe the potential demonstration effect on other states from licensing the General Electric-Hitachi Global Laser Enrichment Commercial Facility (Docket No. 70-7016) in Wilmington, North Carolina raises significant proliferation issues. Should the United States be seen to embrace the use of laser isotope enrichment as a commercially viable technology, there can be little question that other states will be strongly encouraged to follow this lead and develop such technology for their own use. Given the great difficulty of detecting laser isotope enrichment facilities, their spread could undermine U.S. nonproliferation efforts and the ability of the International Atomic Energy Agency to confirm the absence of undeclared nuclear activities in nuclear Nonproliferation Treaty (NPT) non-nuclear-weapon states. The rationale for such concerns is set forth in greater detail in the attached article by one of the signers. It is further amplified in another article from one of the signers available at http://www.wired.com/politics/law/magazine/16-10/sl_ferguson. An additional copy of this letter is also attached.

Accordingly, we request (1) that the Commission makes the potential of this facility to contribute to the spread of laser isotope enrichment technology-and thus to the increased risk of nuclear proliferation-an explicit factor in its decision, and (2) that the Commission prepare a Programmatic Environmental Impact Statement on the licensing of laser isotope separation facilities that includes specific consideration of the demonstration effect of such U.S. action on international proliferation risks.

Dr. James Acton, Nonproliferation Associate Carnegie Endowment for International Peace

David Albright, President
Institute for Science and International Security

Thomas B. Cochran, Senior Scientist,
Natural Resources Defense Council

Dr. Charles Ferguson, Senior Fellow for Science and Technology Council on Foreign Relations

John Issacs, Executive Director
Council for a Livable World

Daryl Kimball, Executive Director
Arms Control Association

Miles A. Pomper, Senior Research Associate James Martin Center for Nonproliferation Studies

Monterey Institute of International Studies

Leonard S. Spector, Deputy Director
James Martin Center for Nonproliferation Studies Monterey Institute of International Studies

*Institutional affiliations are for identification purposes only

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