PRM-70-9 (75FR80730) DOCKETED USNRC

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OFFICE OF SECRETARY RULEMAKINGS AND ADJUDICATIONS STAFF

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As of: January 13, 2011 Received: January 12, 2011 Status: Pending_Post Tracking No. 80bc9f8b Comments Due: March 08, 2011 Submission Type: Web

Docket: NRC-2010-0372 Francis Slakey - Nuclear Proliferation Assessments

Comment On: NRC-2010-0372-0003 Francis Slakey on Behalf of the American Physical Society; Receipt of Petition for Rulemaking

Document: NRC-2010-0372-DRAFT-0004 Comment on FR Doc # 2010-32242

Submitter Information

Name: Frank von Hippel Address: Program on Science and Global Security 221 Nassau St, 2nd floor Princeton, NJ, 08542-4601 Submitter's Representative: Frank von Hippel Organization: Princeton University

General Comment

This comment is on behalf of myself, not Princeton University.

I support the American Physical Society petition.

The question of the moment concerns the proposed licensing by the NRC of the Silex Laser Enrichment process. The gas-centrifuge enrichment process has substantially worsened the global proliferation situation because, unlike the gaseous diffusion process, it can be built on a small scale, has relatively low power needs, and is relatively undetectable via either distinctive electromagnetic emissions or gaseous releases. Also, a gas centrifuge plant can be converted quickly from the production of low to highly enriched uranium.

The question is how the Silex process compares with the gas-centrifuge process in these respects? The US Government should assess these questions before being the first government to permit the public demonstration that laser enrichment is practical and economical.

My understanding is that the NRC has argued that the proliferation dangers from this technology can be contained by keeping key design features secret. But we know how well secrecy worked in containing the designs of nuclear and thermonuclear weapons and the production of plutonium and highly enriched uranium. The key secret is that the technology is feasible. GE-Hitachi is claiming that it is and is requesting a license to demonstrate that fact. Once they have done so, whatever damage this technology can cause to the nonproliferation regime will have mostly been done.

I therefore urge the NRC to require of itself a nonproliferation assessment of at least any new technology for enriching uranium and that the findings of such a proliferation assessment be given major weight in the licensing decision.

Frank von Hippel

Professor of Public and International Affairs, Princeton University Co-chair, International Panel on Fissile Materials

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Rulemaking Comments

From: Sent: To: Subject: Attachments: Gallagher, Carol Thursday, January 13, 2011 9:14 AM Rulemaking Comments Commente on PRM-70-9 NRC-2010-0372-DRAFT-0004.pdf

Van,

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Attached for docketing is a comment from Frank von Hippel on PRM-70-9 (75 FR 80730) that I received via the regulations gov website on 1/12/11.

Thanks, Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by OWMS01.nrc.gov ([148.184.100.43]) with mapi; Thu, 13 Jan 2011 09:14:40 -0500 Content-Type: application/ms-tnef; name="winmail.dat" Content-Transfer-Encoding: binary From: "Gallagher, Carol" <Carol Gallagher@nrc.gov> To: Rulemaking Comments <Rulemaking Comments@nrc.gov> Date: Thu, 13 Jan 2011 09:14:18 -0500 Subject: Commente on PRM-70-9 Thread-Topic: Commente on PRM-70-9 Thread-Index: AcuzLCrDPr7jniJLRU+WSSoDmqmeTw== Message-ID: <6F9E3C9DCAB9E448AAA49B8772A448C55EE2E91362@HQCLSTR01.nrc.gov> Accept-Language: en-US Content-Language: en-US X-MS-Has-Attach: yes X-MS-Exchange-Organization-SCL: -1 X-MS-TNEF-Correlator: <6F9E3C9DCAB9E448AAA49B8772A448C55EE2E91362@HQCLSTR01.nrc.gov> MIME-Version: 1.0