PRM-70-9
(75FR80730)

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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-0019
Comment on FR Doc # 2010-32242

Submitter Information

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General Comment

I am writing in support of the American Physical Society's petition (Docket ID NRC-2010-0372) to change the Nuclear Regulatory Commission's rules to require Nuclear Proliferation Assessments as part of the NRC licensing process.

I support an amendment to regulations at subpart D of 10 CFR part 70, "Domestic Licensing of Special Nuclear Material," Sec. 70.22, to include the following language to be made part of an applicant's license application: Nuclear Proliferation Assessment. Each applicant for the license of an enrichment or reprocessing facility shall include an assessment of the proliferation risks that construction and operation of the proposed facility might pose. Such an assessment must be prepared in draft form and be required to be reviewed by NRC staff, recognized external experts and members of the public and that public comments be solicited and incorporated into a final version of the assessment.

New nuclear technologies, such as the proposed GE-Hitachi laser enrichment facility in North Carolina or new spent fuel reprocessing technologies for which licensing regulations are being developed, could pose unique and substantial proliferation risks. The Atomic Energy Act requires the NRC to deny licenses that would be "inimical to the common defense and security" of the United States. Therefore, the NRC must have the proper basis on which to make licensing determinations and is therefore legally obligated to analyze the proliferation implications of these new technologies within a revised licensing process.Technologies that are developed by the U.S. are of interest to the rest of the world and it is apparent that the laser isotope technology and other technologies, if successful, will be prone to spreading. It is thus essential that a proliferation assessment be prepared before a technology is licensed, rather than waiting to deal with a situation where the technology may be proliferating due to commercial demands or because of clandestine use.

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Rulemaking Comments

From: Gallagher, Carol
Sent: Tuesday, March 01, 2011 8:19 AM
To: Rulemaking Comments
Subject: Comment letter on PRM-70-9
Attachments: NRC-2010-0372-DRAFT-0019.pdf

Van,

Attached for docketing is a comment letter from Martha Lightfoot on the above noted PRM (75 FR 80730) that I received via the regulations.gov website on 2/28/11.

Thanks,
Carol

Received: from HQCLSTR01.nrc.gov ([148.184.44.76]) by TWMS01.nrc.gov
([148.184.200.145]) with mapi; Tue, 1 Mar 2011 08:19:09 -0500
Content-Type: application/ms-tnef; name="winmail.dat"
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From: "Gallagher, Carol" <Carol.Gallagher@nrc.gov>
To: Rulemaking Comments <Rulemaking.Comments@nrc.gov>
Date: Tue, 1 Mar 2011 08:19:10 -0500
Subject: Comment letter on PRM-70-9
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