



HITACHI

GE Hitachi Nuclear Energy

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MFN 11-135
March 24, 2011

U.S. Nuclear Regulatory Commission
Mr. Lawrence Kokajko, Director of High Level Waste Repository Safety
11555 Rockville Pike
Rockville, MD 20852

Dear Mr. Kokajko:

I am writing to express the continuing commitment of General Electric-Hitachi (GEH) to developing our Power Reactor Innovative Small Modular (PRISM)/Advanced Recycling Center (ARC) technology. This US developed technology solves three domestic energy issues not currently addressed with conventional nuclear technology. First, it recycles spent nuclear fuel and reduces long-lived radioactive material. Second, it supports energy security by vastly increasing the energy that can be extracted from our uranium resources. Third, it provides an option for a more cost-effective method of disposing of weapons plutonium. These benefits are in addition to the low carbon benefits of nuclear electricity production.

A key activity to enabling introduction of this technology is the creation and application of supporting regulations. Therefore we are strongly supportive of the recycling rulemaking process. We are also in support of a licensing basis that is truly technology neutral and does not disadvantage US developed technology.

Recycling rulemaking will allow GEH to proactively participate in the NRC regulatory process. It will allow us to understand the process by which our technology will be reviewed and contribute our technical expertise to a broadly applicable approach.

We understand that the NRC has committed resources to the preliminary rulemaking process and realize this has been a challenge given the many priorities of the commission. We also realize that there are other circumstances that, at any given time, can determine the direction by which resources are allocated throughout the NRC. But note that our industry is committed to the recycling process as evident by the continued investment in the many different technologies.

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Continued progress and a definitive date for a Final Rule on the licensing of a recycling facility is a major step forward, and GEH stands ready to work with you and your staff in answering any questions as the rulemaking process unfolds. In particular, we welcome the opportunity to better explain our recycling method in more detail to support the necessity of making a Final Rule that is technology neutral.

The Nuclear Energy Institute (NEI) has publicly supported a technology neutral rulemaking on behalf of the recycling industry. It is our hope that the NRC will consider the industry position while developing this important rule.

GEH is committed at the highest levels of our company to seeing the recycling rulemaking process through.

Thank you for your leadership on this important issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jerald G. Head".

Jerald G. Head
Senior Vice President
Regulatory Affairs