

EDO Principal Correspondence Control

FROM: DUE: / /

EDO CONTROL: G20110345
DOC DT: 04/27/11
FINAL REPLY:

Jacques Besnainou
AREVA

TO:

Chairman Jaczko

FOR SIGNATURE OF :

** GRN **

CRC NO: 11-0276

DESC:

Future Recycling Facilities
(EDATS: SECY-2011-0283)

ROUTING:

Borchardt
Weber
Virgilio
Ash
Muessle
OGC/GC
Johnson, NRO
Moore, FSME
Burns, OGC
Frazier, OEDO

DATE: 05/11/11

ASSIGNED TO:

NMSS

CONTACT:

Haney

SPECIAL INSTRUCTIONS OR REMARKS:

For Appropriate Action. If a response is made,
please provide copies to OEDO and SECY.

Template: SECY-017

ERIDS: SECY-01

EDATS

Electronic Document and Action Tracking System



EDATS Number: SECY-2011-0283

Source: SECY

General Information

Assigned To: NMSS

OEDO Due Date: NONE

Other Assignees:

SECY Due Date: NONE

Subject: Future Recycling Facilities

Description:

CC Routing: NRO; FSME; OGC

ADAMS Accession Numbers - Incoming: NONE

Response/Package: NONE

Other Information

Cross Reference Number: G20110345, LTR-11-0276

Staff Initiated: NO

Related Task:

Recurring Item: NO

File Routing: EDATS

Agency Lesson Learned: NO

OEDO Monthly Report Item: NO

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Priority: Medium

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Sensitivity: None

Approval Level: No Approval Required

Urgency: NO

OEDO Concurrence: NO

OCM Concurrence: NO

OCA Concurrence: NO

Special Instructions: For Appropriate Action. If a response is made, please provide copies to OEDO and SECY.

Document Information

Originator Name: Jacques Besnainou

Date of Incoming: 4/27/2011

Originating Organization: AREVA

Document Received by SECY Date: 5/11/2011

Addressee: Chairman Jaczko

Date Response Requested by Originator: NONE

Incoming Task Received: Letter

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

Date Printed: May 09, 2011 16:30

PAPER NUMBER: LTR-11-0276 **LOGGING DATE:** 05/09/2011
ACTION OFFICE: EDO

AUTHOR: Mr. Jacques Besnainou (AREVA)
AFFILIATION:
ADDRESSEE: CHRM Gregory Jaczko
SUBJECT: Concerns fuel cycle services globally

ACTION: Appropriate
DISTRIBUTION: RF

LETTER DATE: 04/27/2011
ACKNOWLEDGED: No
SPECIAL HANDLING:

NOTES:
FILE LOCATION: ADAMS

DATE DUE: **DATE SIGNED:**

EDO --G20110345



Jacques Besnainou
Chief Executive Officer

April 27, 2011

Hon. Gregory Jaczko
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Jaczko:

As you are aware, AREVA provides fuel cycle services globally. With the experience gained from 40 years operating the world's largest and most successful fuel recycling complex – with commercial separation and waste conditioning at our La Hague facilities, MOX fuel fabrication at our MELOX facility, and recent licensing experience supporting the Mixed Oxide Fuel Fabrication Facility in Aiken, SC – AREVA is uniquely positioned to support initiatives to implement fuel recycling.

AREVA has been evaluating the establishment of a commercial used fuel recycling center in the U.S. for the last five years. In 2010, Senator Voinovich proposed new legislation that would support recycling as an option to the integrated used fuel strategy in the U.S. Several states and communities have asked AREVA to site a recycling center in their jurisdiction. We are therefore seriously considering a commercial U.S. facility and have been working with the U.S. Recycling Advisory Panel (USRAP), a subcommittee of the Nuclear Infrastructure Council (NIC) that involves both representatives from utilities and suppliers, to support this activity. Assuming a final rule in 2015 (as identified by NRC in public meetings on September 7 and October 19, 2010), current projections suggest that construction could begin as early as 2020, with receipt of used fuel in 2025, and initial fuel treatment in 2030. Licensing by the NRC is on the critical path.

AREVA applauds the NRC's work identifying gaps in the existing licensing basis for recycling facilities, the ongoing work on the regulatory basis, and strongly encourages the NRC to continue this activity to meet the announced schedule objective of final rulemaking in 2015 to address appropriate changes to the licensing process. Our view is still consistent with fundamental recommendations made previously and mentioned during NRC public meetings. First, recycling facilities should be addressed under a new Part (referred to as Part 7x/5x). Second, a one-step licensing process is needed for the same reasons that underpin the reactor COL process. As the requisite investment for such a fuel cycle facility is larger than for a power plant, no prudent company (or

AREVA INC.

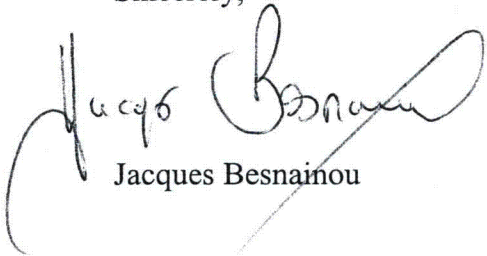
One Bethesda Center - 4800 Hampden Lane, Suite 1100, Bethesda, MD 20814
Tel.: 301 841 1642 - Fax: 301 841 1611 - www.aveva.com

companies) will enter into a process which could authorize construction but leave uncertainty about future approval for operation.

In summary, AREVA strongly urges the NRC to continue its activities into Fiscal Years 2011 through 2015 to prepare a modern licensing basis for future recycling facilities. With its extensive experience in recycling, AREVA pledges to assist the NRC staff by providing non-proprietary information where it can be useful to the staff in its development activities.

Please feel free to contact me at AREVA if you wish to discuss the recommendations contained in this letter.

Sincerely,



Jacques Besnainou