

**Arce, Jeannette**

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**From:** csinger@illinois.edu  
**Sent:** Friday, July 01, 2011 11:56 AM  
**To:** Rulemaking Comments  
**Subject:** ID NRC-2010-0267 Comments

To the Secretary, U.S. Nuclear Regulatory Commission, for the attention of the Rulemakings and Adjudication Staff:

In the attached file NRC-020-0267Comments1July2011.pdf, you will find a portable data file version of the following comments concerning ID NRC-2010 -0267.

Regards,  
Clifford Singer

613 W. Washington  
Urbana, IL 61801  
July 1, 2011

Re: ID NRC-2010-0267

Secretary, U.S. Nuclear Regulatory Commission Washington, DC 20555-001  
Attn: Rulemakings and Adjudication Staff

To the NRC Commission:

Concerning the Draft Regulatory Basis for a Potential Rulemaking on Spent Nuclear Fuel Reprocessing Facilities, I would like to draw your attention to the following recommendation:

Require any licensed spent fuel reprocessing facility to be licensed as well for possible continuing on-site storage of any spent fuel intake and of all reprocessing product streams. This recommendation is from a broader examination of spent nuclear fuel management, " 'Plan D' for Spent Nuclear Fuel," (<http://acdis.illinois.edu/publications/207/publication-PlanDforSpentNuclearFuel.html>, 2009), which describes the consensus from a Midwestern workshop of fourteen participants, primarily university professors from nuclear engineering programs. It should be noted that this recommendation deals only with requirements for licensing a reprocessing facility, not whether one should actually be licensed or constructed, and that a consensus report does not necessarily require unanimity on each of its recommendations.

My own understanding of the reasoning behind this recommendation is that it is not currently possible to guarantee either that spent fuel that is moved to a reprocessing facility will actually all be successfully processed, nor that all radioactive material in reprocessing product streams will be removed from such a facility within a specified time period. This conclusion is based both on historical experience and the current situation with radioactive waste management in the United States. It follows that a new reprocessing facility may well become a de facto radioactive waste management facility with no date certain for removal of radioactive material from the facility site, and should therefore be licensed as such. Unless and until this situation changes, any new radioactive material brought into such a facility creates an additional spent fuel management responsibility of possible indefinite duration, and thus licensing for this possibility should be included irrespective of whether such a site already contains other radioactive material. The conclusions drawn in this paragraph are my own and are not meant to represent those of any institution or other individuals.

Transmitted electronically by  
Clifford Singer

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