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# Nuclear Watch South

DOCKETED  
USNRC

July 7, 2011

July 13, 2011 (3:35 pm)

Secretary, U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attn: Rulemakings and Adjudications Staff

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**Re: Comment on Docket ID NRC-2010-0267, "Rulemaking on Reprocessing"**

Nuclear Watch South opposes the development of regulations for reprocessing and supports a decision by the Commission to defer rulemaking for regulations that are not needed and for which no urgency has been established.

We oppose consideration of a one-step licensing process for reprocessing plants as this approach not only would be applied to speculative and untested reprocessing and associated technologies but also would reduce public opportunity for involvement in the licensing process.

Reprocessing leads to a myriad of hard-to-manage radioactive waste streams, including high-level waste, Greater-than-Class-C waste, low-level waste, noble gases, contaminated uranium, and weapons-usable plutonium. These waste streams are more difficult to manage and isolate from the biosphere than the original irradiated fuel and create a greater volume of stranded wastes with zero reduction in radioactivity. We support containment and isolation of radioactivity from the environment but reprocessing achieves the opposite result, with a higher economic cost than managing spent fuel via Hardened On-Site Storage (HOSS).

Reprocessing is not recycling — it is plutonium separation. Given the waste streams generated via reprocessing which have no value or use it is incorrect and misleading to call it recycling. The U.S. has, in the past, under Presidents Ford and Carter, forestalled separation of plutonium from civilian radioactive waste out of concern for the spread of fissile plutonium, a policy which has helped to slow the global spread of nuclear weapons. There is no established national policy to use plutonium fuel on a wide-spread commercial basis and the Department of Energy's weapons-based MOX fuel program is facing many hurdles as no reactors have signed on to use MOX.

The NRC must conduct a full Programmatic Environmental Impact Statement — from "cradle to grave," as required by the National Environmental Policy Act BEFORE embarking on a rulemaking. The overall consequences of reprocessing and associated facilities and processes as it relates to the entire nuclear fuel cycle must be analyzed as well as the economic impacts and full assessment of the need and alternatives such as HOSS. The issue of international proliferation of nuclear weapons materials must also be included in this analysis.

Respectfully submitted,  
Glenn Carroll, Coordinator

## Rulemaking Comments

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**From:** Glenn Carroll [atom.girl@mindspring.com]  
**Sent:** Friday, July 08, 2011 12:45 AM  
**To:** Rulemaking Comments  
**Subject:** Comment on Docket ID NRC 20100267 "Draft Regulatory Basis for a Potential Rulemaking on Spent Nuclear Fuel Reprocessing Facilities"  
**Attachments:** pu\_sep\_comments\_NRC.doc

Attached are Nuclear Watch South comments for Docket #NRC-2010-0267 "Rulemaking on Reprocessing." Please let me know if you have trouble with either the attachment or the file.

The text of the letter is:

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Glenn Carroll, Coordinator

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NUCLEAR WATCH SOUTH



**Nuclear Watch South**

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