

June 28, 2013

General Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Executive Secretary
U.S. Department of State
Washington, DC 20520

Tom Clements

Southeastern Nuclear
Campaign Coordinator
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**Re: Application XSNM3745 for a License to the U.S. Nuclear Regulatory Commission
for Export of Highly Enriched Uranium from the U.S. to Canada:
Time to Halt Bomb-Grade Uranium Shipments**

And, to be Filed in Docket No. 71-9225

To Whom it Concerns:

This is a comment being submitted by public interest groups in the United States and Canada concerning the June 4, 2013 application to export of bomb-grade uranium from the U.S. Department of Energy's National Nuclear Security Administration's Y-12 National Security Complex in Oak Ridge, Tennessee to the Atomic Energy of Canada, Limited's National Research Universal (NRU) reactor at Chalk River Laboratories in Canada. The end use of the highly enriched uranium (HEU) is for production of medical isotopes.

While we are not now formally intervening against the license request now before the U.S. Nuclear Regulatory Commission to export 7.0 kilograms of 93.35% HEU to Chalk River, we want to go on record as supporting a prompt halt to HEU shipments from the U.S. to Canada. No HEU shipments to the NRU reactor should take place beyond the 2016 date for ending HEU-use in the NRU reactor, as recently announced by Natural Resources Minister Joe Oliver.

While conversion of the NRU reactor from HEU use is long overdue, Canada must be held to its commitment that HEU use at the reactor will soon halt and that other options for medical isotope production will be pursued. This means that the current license request for HEU export will be one of the very last that will be submitted. We will be attentive to any future applications for export of HEU from the U.S. to Canada and will oppose any requests which would take the NRU reactor beyond the HEU halt in mid-2016.

Additionally, we want to express concern about plans by the U.S. Department of Energy to import liquid high-level waste from Chalk River for processing in the DOE's aging H-Canyon reprocessing plant located at the Savannah River Site in South Carolina. Though a request for a full Supplemental Environment Impact Statement (SEIS) was requested by numerous public interest groups in the U.S. (at <http://tinyurl.com/mwehqhw>), DOE has so far turned down that request. Such an SEIS is still needed as

it would evaluate alternatives to the risky shipment of such waste over our highways and bridges and would evaluate options to treat the liquid waste in place at Chalk River.

Waste from the reprocessing of HEU targets has in recent years been managed in Canada and there has been no explanation as to why the liquid HLW, which has been stored in a single tank since 2003, cannot also be processed on site at Chalk River and stored in Canada. Waste from processing of targets made from the final shipments of HEU to Canada must also be disposed of in Canada.

Though there have been unsubstantiated claims that the liquid waste shipment is being planned for nuclear non-proliferation reasons, denaturing of the HEU in the liquid waste via addition of depleted uranium nitrate to the waste tank may well present the soundest option from a nuclear non-proliferation standpoint. DOE's rejection of the request to prepare an in-depth SEIS means that the evaluation of this proposal and options to manage the waste in Canada have been ignored.

Failure to consider the "denature-in-place" option may well be a blow to sound nuclear non-proliferation policies in both the U.S. and Canada and reflects a denial to citizens on both sides of the border to submit formal comment on that and other disposition options.

Given the goal of promptly eliminating all commerce in bomb-grade uranium, we thank you very much for considering the views expressed in this letter. We request that the letter be made a formal part of the record for export license XSNM3745 and that it be placed in the NRC's digital library. If you have questions about this letter or the issues discussed in it, please contact Tom Clements, Friends of the Earth, Columbia, South Carolina, tel. 803-834-3084, tomclements329@cs.com.

Sincerely,

Tom Clements
Friends of the Earth
Columbia, South Carolina

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Buffalo, New York

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Sierra Club Nuclear Free Campaign
Washington, DC

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Sierra Club Canada
Ottawa, Ontario

Michael J. Keegan
Coalition for a Nuclear Free Great Lakes
Monroe, Michigan

Alice Hirt
Don't Waste Michigan
Holland, Michigan

Emma Lui
Council of Canadians
Ottawa, Ontario

Kathryn Barnes
Don't Waste Michigan- Sherwood Chapter
Sherwood, Michigan

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Terry Lodge

Concerned Citizens of Renfrew County
Pembroke, Ontario

Toledo Coalition for Safe Energy
Toledo, Ohio

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Oak Ridge Environmental Peace Alliance (OREPA)
Oak Ridge, Tennessee

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Citizens Resistance at Fermi 2
Gore, Oklahoma

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Provincial Council of Women of Ontario
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Peterborough, Ontario

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Boulder, Colorado

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Tri-Valley Cares
Livermore, California

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Citizens' Environmental Coalition
Albany, New York

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The Saskatoon Peace Coalition
Saskatoon, Saskatchewan

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Toronto, Ontario

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Physicians for Global Survival (PGS)
Saskatoon, Saskatchewan

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Regina, Saskatchewan

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Beyond Nuclear
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Toronto, Ontario

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Saskatchewan

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Harrison, Ohio

RESOLUTION AGAINST THE TRANSPORT OF LIQUID RADIOACTIVE WASTE

May 15, 2013

WHEREAS the U.S. Department of Energy plans to truck 23,000 litres of high-level radioactive liquid waste from Chalk River Laboratories (CRL), Ontario, to the Savannah River Site (SRS), South Carolina, in a series of weekly shipments over a period of a year or more;

WHEREAS these shipments could begin as early as August 2013;

WHEREAS high-level radioactive liquid waste has never previously been transported over public roads and bridges in North America;

WHEREAS the high-level radioactive liquid waste contained in just one of the planned shipments is more than enough to ruin an entire city's water supply;

WHEREAS there have been no public environmental assessment hearings in Canada or the U.S., nor any other kind of public forum on either side of the border, to address the hazards of such shipments of liquid radioactive wastes over public roads and bridges;

WHEREAS there has been no public process to discuss alternatives to the proposed shipments of liquid radioactive waste over public roads and bridges, such as on-site solidification of the wastes prior to shipment – given that such solidification has been carried out routinely for all the high-level liquid waste that has been produced at Chalk River since 2003;

WHEREAS high-level radioactive waste is the most radioactive material on the planet, created by the irradiation of uranium and/or plutonium in a nuclear reactor;

WHEREAS high-level radioactive waste gives off such intense penetrating radiation that it remains unapproachable for centuries;

WHEREAS high-level radioactive waste remains extraordinarily radiotoxic for millennia;

WHEREAS high-level radioactive liquid waste is created when the solid high-level waste from a nuclear reactor is dissolved in nitric acid, resulting in a highly corrosive solution containing dozens of radiotoxic materials such as cesium-137, iodine-129, strontium-90;

WHEREAS the high-level radioactive liquid waste from Chalk River contains a significant amount of weapons-grade uranium (HEU = highly enriched uranium) – the same material that was used as a nuclear explosive in the first atomic bomb dropped in 1945;

RESOLUTION AGAINST THE TRANSPORT OF LIQUID RADIOACTIVE WASTE

WHEREAS the principal justification for transporting the Chalk River liquid waste to the Savannah River Site is to rid Canada of the potential proliferation risk associated with the weapons-grade uranium that is still left in the liquid solution;

WHEREAS the Savannah River Site is one of the most radioactively contaminated sites in the entire DOE complex of nuclear weapons related facilities;

WHEREAS the continued operation of the aging H-Canyon reprocessing plant at the Savannah River Site to process the Chalk River liquid waste, as planned, will pose unnecessary safety risks, will add additional volumes of high-level radioactive waste into the already over-burdened SRS waste management system and will place unsustainable demands on the DOE budget;

WHEREAS all the non-proliferation objectives associated with the Chalk River liquid waste can be met by "denaturing" the weapons grade uranium on site at the Chalk River Laboratories so that it is no longer weapons-usable material and hence poses no further proliferation risk;

THEREFORE BE IT RESOLVED that the organizations listed on the following pages: *[for list see http://ccnr.org/Endorsing_Groups.pdf]*

- (1) are opposed in principle to any shipment of radioactive liquid waste over public roads and bridges, or on any navigable waterways, or by air, recognizing that such waste can be, has been and should be solidified so that it is far less accessible to the environment of living things;
- (2) urge the governments of Canada and the United States to halt the shipment of high-level radioactive liquid waste from Chalk River Laboratories to the Savannah River Site pending the outcome of full public consultations on the advisability and the potential adverse impacts of the proposed shipments, as well as alternative procedures to achieve the stated objectives for such shipments;
- (3) urge the governments of Canada and the United States, and the governments of all states, provinces, and municipalities, as well as the indigenous and sovereign governments of Native American Indian tribal peoples of the USA, and the several nations of Aboriginal Peoples in Canada, to do everything in their power to disallow and prevent the shipment of liquid radioactive waste over public roads and bridges, or on any navigable waterways, or by air.

Please send a notice of your organization's endorsement of this resolution to Canadian Coalition for Nuclear Responsibility (CCNR) e-mail: ccnr@web.ca

Groups Endorsing the Resolution Against the Transport of Liquid Radioactive Waste

66 Endorsing Groups as of June 20, 2013

Alliance for a Green Economy
Syracuse, New York
Contact: Jessica Azulay
e-mail: jessica@allianceforagreenecconomy.org

Artists for Peace / Les Artistes pour la paix
Montreal, Quebec
Contact: Pierre Jasmin
e-mail: jasmin.pierre@ugam.ca

L'Association pour la Protection de
l'Environnement des Hautes Laurentides (APEHL)
Contact: François Lapierre
e-mail: francois.lapierre@tlb.sympatico.ca

Beyond Nuclear
Takoma Park, Maryland
Contact: Kevin Kamps
e-mail: kevin@beyondnuclear.org

Canadian Association of Physicians for the Environment (CAPE)
Toronto, Ontario
Contact: Gideon Forman
e-mail: gideon@cape.ca

Canadian Coalition for Nuclear Responsibility (CCNR)
Montreal, Quebec
Contact: Gordon Edwards
e-mail: ccnr@web.ca

Centricoises et mauricienNES pour le déclasséement nucléaire
(Mauricie residents for nuclear decommissioning)
Trois Rivières, Quebec
Contact: Sébastien Bois
e-mail: declassmentnucleaire@gmail.com

Check this link later to see updated listings

Citizens Environmental Coalition
Albany, New York
Contact: Barbara Warren
e-mail: warrenba@msn.com

Citizens for Alternatives to Chemical Contamination (CACC)
Lake Station, Michigan
Contact: Kay Cumbow
e-mail: kcumbow@greatlakes.net

Clean Green Saskatchewan
Saskatoon, Saskatchewan
Contact: David Greenfield
e-mail: greenfd@sasktel.net

Coalition for a Nuclear Free Great Lakes
Monroe, Michigan
Contact: Michael J. Keegan
e-mail: mkeeganj@comcast.net

Committee for Environmentally Sound Development
New York, New York
Contact: Olive Freud
e-mail: elfreud@aol.com

Community Health Concerns Committee
Port Hope, Ontario
Contact: Faye More
e-mail: more_faye@yahoo.com

Concerned Citizens of Renfrew County (CCRC)
Pembroke, Ontario
Contact: Ole Hendricksen
e-mail: ole@nrtco.net

Text of the Resolution Against the Transport of Liquid Radwaste: http://ccnr.org/resolution_CRL_SRS_2013.pdf

Groups Endorsing the Resolution Against the Transport of Liquid Radioactive Waste

Connecticut Coalition Against Millstone
Redding Ridge, Connecticut
Contact: Nancy Burton
e-mail: nancyburtonct@aol.com

Council of Canadians – National Office
Ottawa, Ontario
Contact: Brent Patterson
e-mail: bpatterson@canadians.org

Council of Canadians – Saint John Chapter
Saint John, New Brunswick
Contact: Leticia Adair
e-mail: ladair@nb.aibn.com

Crabshell Alliance of
Greater Baltimore, Maryland
Contact: Dagmar Fabian
e-mail: dagmarfabian@gmail.com

Don't Waste Arizona
Phoenix, Arizona
Contact: Stephen Brittle
e-mail: dwaz@fastq.com

Don't Waste Michigan
Holland, Michigan
Contact: Alice Hirt
e-mail: alicehirt@gmail.com

Durham Nuclear Awareness(DNA)
Whitby, Ontario
Contact: Janet McNeill
e-mail: mcneill.janet@gmail.com

Ecological Options Network
Bollinas, California
Contact: Mary Beth Brangan
e-mail: marybeth@eon3.net

Environmentalists, Inc.
Columbia, SC and Columbus, NC
Contact: Mel Jenkins
e-mail: greenpalmetto@yahoo.com

Friends of the Earth USA (FOE)
Columbia, South Carolina
Contact: Tom Clements
e-mail: tomclements329@cs.com

Friends of the St. Clair River Watershed
Port Huron, Michigan
Contact: Lesley L. Lambright
e-mail: info@scriver.org

Heart of America Northwest
"The Public's Voice for Hanford Cleanup"
Washington and Oregon States
Contact: Rep. Gerry Pollet, JD
e-mail: gerry@hoanw.org

Grand Rapids Chapter, Don't Waste Michigan
Grand Rapids, Michigan
Contact: Corinne Carey
e-mail: auntienuke@aol.com

Great Lakes United (GLU)
Buffalo, New York
Contact: John Jackson
e-mail: jjackson@glu.org

Groups Endorsing the Resolution Against the Transport of Liquid Radioactive Waste

The Helen Caldicott Foundation
Asheville, North Carolina
Contact: Mali Lightfoot
e-mail: MaliLightfoot@gmail.com

Hiroshima Day Coalition
Toronto, Ontario
Contact: Vinay Jindal
e-mail: vinay@live.ca

Ikanawtiket Environmental Inc.
Truro Heights, Nova Scotia
Contact: Joshua McNeely
e-mail: jmcneely@ikanawtiket.ca

International Institute of Concern for Public Health IICPH
Toronto, Ontario
Contact: Anna Tilman
e-mail: annatilman@sympatico.ca

Maritime Aboriginal Peoples Council
Truro Heights, Nova Scotia
Contact: Roger Hunka
e-mail: rhunka@mapcorg.ca

Michigan Stop The Nuclear Bombs Campaign
Madison Heights, Michigan
Contact: Kim Bergier
e-mail: 2mistnbc@gmail.com

Minnesota Peace Group
Fairmont, Minnesota
Contact: Judi Poulson
e-mail: judpeace@gmail.com

Mouvement Sortons le Québec du Nucléaire (MSQN)
(Movement to Phase Out Nuclear in Quebec)
Quebec City, Quebec
Contact: Michel Duguay
e-mail: michel.duguay@gel.ulaval.ca

Mouvement vert Mauricie (MVM)
(The Green Movement of the Mauricie Region)
St-Mathieu-du-Parc, Quebec
Contact: Michel Fugère
e-mail: mfugeremvert@sympatico.ca

Le Municipalité de Saint-Fabien
Saint-Fabien, Québec
Contact: Suzanne Tremblay
e-mail:

National Council of Women of Canada
Ottawa, Ontario
Contact: Gracia Janes
e-mail: gracia.janes@bellnet.ca

Nature Quebec
Quebec City, Quebec
Contact: Christian Simard
e-mail: Christian.Simard@naturequebec.org

Nevada Nuclear Waste Task Force
Las Vegas, Nevada
Contact: Judy Treichel
e-mail: Judynwtf@aol.com

NOAH Friends of the Earth Denmark
Copenhagen, Denmark
Contact: Palle Bendsen
e-mail: noah@noah.dk

Groups Endorsing the Resolution Against the Transport of Liquid Radioactive Waste

No Nuker Taiwan
Taipei, Taiwan
Contact: Jimi Chen
e-mail: jimicdchen@gmail.com

Northwatch
Northeastern Ontario
Contact: Brennain Lloyd
e-mail: northwatch@northwatch.org

Nuclear Energy Information Service (NEIS)
Chicago, Illinois
Contact: David Kraft
e-mail: neis@neis.org

Nuclear Information and Resource Service (NIRS)
Takoma Park, Maryland
Contact: Diane D'Arrigo
e-mail: Dianed@nirs.org

Nuclear Watch South
Atlanta, Georgia
Contact: Glenn Carroll
e-mail: nukewatchsouth@mindspring.com

Nukewatch
Luck, Wisconsin
Contact: Bonnie Urfer or John LaForge
e-mail: nukewatch1@lakeland.ws

Ohio Sierra Club
Columbus, Ohio
Contact: Pat Marida
e-mail: marida@wideopenwest.com

Ontario Coalition of Aboriginal People
Wabigoon, Ontario
Contact: Brad Maggrah
e-mail: ocapprez@gmail.com

Physicians for Global Survival
Ottawa, Ontario
Contact: Linda Harvey
e-mail: linda.harvey@xplornet.com

Peterborough and Kawarthas Chapter
Council of Canadians
Peterborough, Ontario
Contact: Roy Brady
e-mail: rbrady1@cogeco.com

Peterborough Health Coalition
Peterborough, Ontario
Contact: Roy Brady
e-mail: rbrady1@cogeco.com

Proposition One Nuclear Free Future Campaign
Tryon, North Carolina
Contact: Ellen Thomas
e-mail: et@prop1.org

Provincial Council of Women of Ontario
Toronto, Ontario
Contact: Gracia Janes
e-mail: gracia.janes@bellnet.ca

Regroupement pour la surveillance du nucléaire (RSN)
(see Canadian Coalition for Nuclear Responsibility)
Montreal, Quebec
Contact: Gordon Edwards
e-mail: ccnr@web.ca

Groups Endorsing the Resolution Against the Transport of Liquid Radioactive Waste

Le Réseau québécois des groupes écologistes (RQGE)
Montréal, Québec
Contact: François Lapierre
e-mail: tresorie@rqge.qc.ca

Safe and Green Energy (SAGE)
Peterborough, Ontario
Contact: Jeff Brackett
e-mail: brackett@nexicom.net

Saint John Area KAIROS
Canadian Ecumenical Justice Initiatives
Saint John, New Brunswick
Contact: Angelina Martz
e-mail: aam_angie@hotmail.com

Science For Peace
Toronto, Ontario
Contact: Judith Deutsch
e-mail: j.deutsch@utoronto.ca

Sierra Club Canada
Ottawa, Ontario
Contact: John Bennett
e-mail: jb@sierraclub.ca

Snake River Alliance
Boise, Idaho
Contact: Liz Woodruff
e-mail: lwoodruff@snakeriveralliance.org

Stand Up / Save Lives Campaign
Burr Ridge, Illinois
Contact: Maureen Headington
e-mail: moeteam@comcast.net

Vermont Citizens Action Network
Hancock, Vermont
Contact: Chris Williams
e-mail: cevan@sover.net

Veterans Against Nuclear Arms (VANA)
Toronto, Ontario
Contact: Anton Wagner
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La Ville d'Amqui
Amqui, Québec
Contact: Le maire Gaétan Ruest
e-mail: gruest@ville.amqui.qc.ca