

December 3, 2013

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
Attention: Rulemaking and Adjudications



**Comment on XSNM3729/01 – Highly Enriched Uranium (HEU) Export to Europe & Conversion to Low Enriched Uranium (LEU) by January 2015 of Medical Isotope Production Reactors**

Dear Madame Secretary:

I am submitting this formal comment for the record regarding export license application XSNM3729/01, as noticed in the Federal Register on December 2, 2013.

The October 16, 2013 license application by the U.S. Department of Energy's National Nuclear Security Administration is for an "increase the quantity of HEU authorized for export from 5.8 kg of U-235 contained in 6.2 kg uranium to a new cumulative total of 12.615 kg of U-235 contained in 13.5 kg uranium" for medical isotope production in the following reactors: BR-2 Research Reactor, HFR Research Reactor, OSIRIS Research Reactor, LVR-15 Research Reactor and the Maria Research Reactor.

The license application notes that the "Time-frame indicated for shipment(s) to support target fabrication, target irradiation and processing schedules for one year isotope production demand until conversion to LEU targets." Further, the NNSA application letter states "IRE [Institute for Radioelements] is actively working with the US government to implement a plan to convert to low enriched uranium targets used for medical isotope production. In the interest of supporting the production of medical isotopes, the NNSA Production Office requests that the review process be executed to support issuance of the export license by January 2014."

Thus, if the amended export license is issued in January 2014 to allow the requested increase in the amount of HEU to be exported, we would expect this shipment to be the last or perhaps next to last shipment of HEU to the mentioned reactors. We thus anticipate that the HEU to be shipped under this amended license will last through 2014 and that conversion of the reactors to LEU will have taken place by January 2015 and that before that time there will be no additional need to export HEU for the named facilities.

Given concern about halting the proliferation risks associated with HEU use, we will be attentive to further requests for export of HEU to the named facilities. If it appears that conversion from HEU to LEU will not take place by January 2015 we will consider formal intervention as allowed by regulations. We would hope that U.S. efforts to help convert the reactors by January 2015 will be successful and are appreciative of those efforts.

I request that this comment be posted in the relevant docket and also in ADAMS.

Sincerely,

A handwritten signature in black ink that reads "Tom Clements".

Tom Clements  
Southeastern Nuclear Campaign Coordinator

Cc: NRC's General Counsel, State Department & DOE's Y-12 facility

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