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September 19, 2016

Ms. Cheryl Moss Herman  
U.S. Department of Energy  
Office of Nuclear Energy  
Mailstop B-409  
19901 Germantown Rd.  
Germantown, MD 20874-1290

**American Nuclear Society Comments on Excess Uranium Management (Request for Information Dated July 19, 2016)**

On behalf of the 11,000 men and women of the American Nuclear Society (ANS), we appreciate the opportunity to provide comments in response to your Request for Information (RFI) pertaining to a new Secretarial Determination that would cover further transfers of uranium for cleanup services at the Portsmouth Gaseous Diffusion Plant and for down-blending of highly-enriched uranium to low enriched uranium (LEU) upon expiration of the 2015 Secretarial Determination.

Your RFI focuses on impacts on the uranium markets and domestic uranium industries. ANS agrees these are important considerations to factor into a new Secretarial Determination. However, DOE should also recognize that enriched uranium is a national resource produced at considerable cost, and that sufficient enriched uranium should be retained to meet the range of potential future needs.

As your office knows well, nuclear power will be an important component of America's future energy mix. There are a number of advanced reactor concepts under development that have the promise to provide safe, affordable, reliable electricity with essentially no greenhouse gas emissions. Some of those advanced reactors would use uranium enriched well above the five weight percent uranium-235 that is currently available from the operating domestic enrichment facility. Accordingly, ANS recommends DOE perform a supply and demand analysis of the future need for U-235 enriched above 5% to support the startup and initial operation of advanced reactors and then set aside a quantity of uranium enriched to 19.9% to meet that future need. Many ANS members are associated with these facilities and their future supply demand issues thru the forecast and allocation of excess uranium program, therefore we also request that in this analysis, a reconsideration be given to retaining additional quantities of uranium that could be

used to fuel university reactors, research reactors and other applications requiring uranium enriched above 5%. It is expected that commercial enrichment capacity up to 20% will be developed once the initial demand is established. In its analysis, DOE should also determine the time needed to re-establish domestic enrichment capability to meet demands for 19.9% fuel and reserve amounts needed to address demand during this interim period.

We believe that a comprehensive view of future demands for 19.9% enriched materials and the facilities and transportation system needed to produce them would benefit the Department in making their final decision.

In closing, we are pleased to provide any additional information or comments as required.

Sincerely,

A handwritten signature in black ink that reads "Andrew C. Klein". The signature is written in a cursive, slightly slanted style.

Andrew Klein  
President  
American Nuclear Society