



April 21, 2015

Mr. Mark Whitney
Acting Assistant Secretary for Environmental Management
U.S. Department of Energy
1000 Independence Ave. SW
Washington, SC 20585

Mr. Jack Craig
SRS Manager Designate
Savannah River Site
P.O. Box A
Aiken, SC 29802

Terminate Proposal to Import German Commercial Spent Fuel for Reprocessing at SRS

Dear Mr. Whitney & Mr. Craig,

I am writing to you to ask you to take steps to formally terminate pursuit of the import of German spent graphite fuel to the Savannah River Site for reprocessing, with resultant high-level waste streams being dumped into the SRS waste tanks.

There are many reasons for terminating the proposal, including:

- the public near SRS does not want such high-level waste coming into the site with no exit strategy;
- the unprecedented import of the commercial spent fuel from Germany into the U.S. would set a bad precedent and indicate that that DOE may consider more such imports that might be taken to SRS for long-term storage;
- additional waste into the aging SRS waste tanks will complicate and delay clean-up of waste already at SRS, distract from that clean-up and increase costs;
- DOE has claimed to German entities that SRS would be a "disposal" site for the spent fuel but such is not the case of such high-level waste must, under U.S. law, go to a geologic repository;
- the two German reactors involved, the long-closed AVR and THTR gas-cooled reactors were commercial reactors connected to the electricity grid and various analyses show that it is illegal under German law to export such fuel, especially for reprocessing;
- legal action in Germany is likely to halt the export of the graphite spent fuel and could end up involving DOE;



- despite ample time to prepare such a document, no nuclear "non-proliferation impact assessment" has been prepared either by the national Nuclear Security Administration (NNSA) or the Office of Environmental Management on the new reprocessing technique being developed by Savannah River National Lab (SRNL);
- the development of a new reprocessing technique by SRNL to manage the hard-to-reprocess spent fuel may pose the largest proliferation concern with the proposal;
- the spent fuel in question poses little, if any, proliferation risk, and the plan until late 2011 was to dispose of it in Germany; such disposal in Germany must be pursued; and
- lack of any other viable storage or disposal options in Germany, including no geologic repository for any commercial spent fuel, the AVR spent fuel can be safely stored at the Forschungszentrum Juelich facility, where it is currently located, until such time as a geologic repository is established in Germany.

Though it appears that the Germans have backed away from the export option, that is not official. Thus, given the reasons cited above, I request that you take steps to show DOE leadership and demonstrate to the public that SRS will not become a nuclear waste processing site for German highly radioactive spent fuel:

1. Formally halt the development by the Office of Environmental Management of a draft environmental assessment on the reprocessing and dumping of the AVR and THTR spent fuel at SRS;
2. Terminate any "work for others" agreements between German entities and SRNL concerning development of a new reprocessing technique for graphite spent fuel and formally terminate any consideration to import the German commercial spent fuel, and;
3. Offer help to Germany of the Office of Environmental Management in determining a path forward for intermediate storage and final disposal of the graphite spent fuel.

Thank you very much for considering the views expressed in this letter and for your efforts to clean up SRS and make sure that no materials come into the site without an exit strategy.

Sincerely,



Tom Clements

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