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T: 202/546-3300
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1725 DeSales Street, NW 6th Floor Washington, DC 20036

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* Nobel Laureate

March 4, 2011

**PRM-70-9
(75FR80730)**

DOCKETED
USNRC

March 7, 2011 (10:30 am)

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

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Subject: Comment on Docket ID NRC-2010-0372, "Petition for Rulemaking, Francis Slakey on Behalf of the American Physical Society"

As Board Members of the Federation of American Scientists, an independent, nonpartisan think tank, we strongly support the petition submitted by the American Physical Society that requests proliferation risk assessments become a required part of the NRC licensing process.

Emerging nuclear fuel technologies such as laser enrichment of uranium can pose significant proliferation risks due to difficulties in detecting facilities using these technologies. If such technologies are developed without a clear, objective, and detailed assessment, they can dangerously undermine U.S. nuclear nonproliferation efforts. In particular, other countries will most likely try to acquire the technologies, and if obtained, it will be easier for them to hide dual-use nuclear activities that could provide both fuel for nuclear reactors or fissile material for nuclear bombs.

Existing uranium enrichment technology is already proving difficult to detect. Last November, North Korea surprised the West by showing a U.S. nuclear weapons expert that it had constructed 2,000 centrifuges to make enriched uranium. Previous laser enrichment research and laboratory-sized activities went undetected for several years in South Korea and Iran.

To limit the possibility of covert construction and use of enrichment facilities, the NRC can and should require a proliferation assessment. In addition, the NRC should only provide licenses to commercialize those technologies that have a unique detectable signature.

Sincerely,

Charles D. Ferguson, President, Federation of American Scientists

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Lt. General Robert Gard, Jr. (Ret.), Chairman of the Center for Arms Control and Non-Proliferation

Rodney W. Nichols, President Emeritus of the New York Academy of Sciences

Valerie Thomas, Anderson Interface Associate Professor of Natural Systems, with a joint appointment in the School of Industrial and Systems Engineering and the School of Public Policy, at the Georgia Institute of Technology

Rulemaking Comments

From: Charles Ferguson [cferguson@fas.org]
Sent: Friday, March 04, 2011 2:06 PM
To: Rulemaking Comments
Subject: Comment on Docket ID NRC-2010-0372; "Petition for Rulemaking, Francis Slakey on Behalf of the American Physical Society"
Attachments: FAS Support APS Pettition on NRC Proliferation Assessments.doc

Dear Sir or Madam:

Please find attached FAS's comment on behalf of the APS petition for rulemaking: Docket ID NRC-2010-0372

Sincerely,

Charles Ferguson

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Charles D. Ferguson, Ph.D.
President
Federation of American Scientists
1725 DeSales Street, NW, 6th Floor
Washington, DC 20036
Tel: 202-454-4699
Fax: 202-675-1010
E-mail: cferguson@fas.org
Web: <http://www.fas.org>
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