

# PUBLIC SUBMISSION

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**Docket:** NRC-2015-0080  
Application for a License to Export High-Enriched Uranium

**Comment On:** NRC-2015-0080-0001  
Application for a License to Export High-Enriched Uranium

**Document:** NRC-2015-0080-DRAFT-0002  
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## General Comment

The Canadian Coalition for Nuclear Responsibility is opposed to the export of 7.56 kg U-235 in 8.1 kg HEU to Chalk River Labs in Ontario. CCNR requests a hearing in which our concerns can be heard and addressed. First and foremost, we are opposed to any ongoing civilian traffic in HEU, particularly in the case of weapons-grade uranium (93.35 % enrichment). Secondly, we note that Canadian nuclear authorities have not acted in good faith in trying to replace HEU targets with LEU targets for isotope production. This is demonstrated not only by the many years that have passed without any progress on this front, but also by the fact that the two new MAPLE reactors (intended to replace the NRU reactor for isotope production) were not designed to use LEU targets at all. The fact that these MAPLE reactors never functioned in a safe manner and so were slated to be dismantled without ever having produced a single batch of isotopes is beside the point; the fact is that Chalk River Labs has never seriously attempted to develop an alternative to HEU and thus have acted in contempt of the provisions of the Schumer amendment. For that reason there is no legitimate grounds for granting the export licence. Thirdly, the US President has embarked on a diligent program of repatriation of HEU of US origin from civilian facilities around the world. Already some 23,000 litres of HEU-bearing highly radioactive liquid waste from the FISST (Fissile Solution Storage Tank) at Chalk River are planned to be shipped to the Savannah River Site in South Carolina where the HEU can be extracted and down-blended. But for the last 10 years, HEU-bearing liquid wastes at Chalk River have been solidified through a process called cementation and to the best of our knowledge the HEU in this solid waste form is not planned to be returned to the USA. A similar fate awaits the HEU that would be shipped under this pending export licence; this weapons-grade uranium would not be repatriated to the USA and hence this export of HEU would be in violation of the President's initiative to repatriate civilian HEU of US origin. For these and other reasons CCNR requests a public hearing where these and other objections to the licence can be heard and adjudicated. Gordon Edwards, Ph.D., President, Canadian Coalition for Nuclear Responsibility, 53 Dufferin Road, Hampstead Quebec, H3X 2X8, Canada. (514) 489 5118 ccnr@web.ca .