

13443

**UNION OF
CONCERNED
SCIENTISTS**

DOCKET NUMBER
EXPORT-IMPORT 1100-4597

FILED
NRC

'92 DEC -1 P12:04

OFFICE OF THE CLERK
DOCKETING SERVICE
WASHINGTON, DC

November 25, 1992

Dr. Ivan Selin
Chair
Nuclear Regulatory Commission
One White Flint North Building
Room 17-D-1
11555 Rockville Pike
Rockville, MD 20555

SERVED DEC - 4 1992

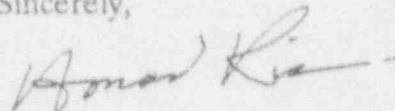
Dear Dr. Selin,

I am writing with regard to the application by Transnuclear Incorporated (XSNM 02702) to export irradiated fuel from the Shoreham nuclear power plant in New York for reprocessing to the Cogema facility at La Hague in France. This application raises a number of very important issues, and we urge the Commission to hold a full public hearing on the matter. Such a hearing has been requested in a petition filed by the Nuclear Control Institute on October 30.

Transnuclear's application is the first attempt in more than a decade by a utility in the United States to reprocess spent nuclear fuel. There remains substantial controversy surrounding the reprocessing of spent nuclear fuel for any purpose. The possible implications of such a decision on the reprocessing industry should be carefully considered. Moreover, if the application is approved, it would set an important precedent for U.S. utilities in the future. Before such a precedent is established, issues such as the potential proliferation risks should be examined in detail in a public forum.

Thank you for your attention to this issue.

Sincerely,



Howard Ris
Executive Director

9212210172 921125
PDR EXPORT
XSNM-2702 PDR

UCS Headquarters: 26 Church Street Cambridge, MA 02238 617-547-5552 FAX: 617-864-9405

1616 P Street NW Suite 310 Washington, DC 20036 202-332-0900 FAX: 202-332-0905
2397 Shattuck Avenue Suite 203 Berkeley, CA 94704 510-843-1872 FAX: 510-843-3785

DOCKET NUMBER
EXPORT-IMPORT

~~11004597~~

DOCKETED
USNRC

'92 DEC -1 P12:04

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

November 23, 1992

Dr. Ivan Selin, Chairman
Nuclear Regulatory Comm.
One White Flint North Building,
Room 17-D-1
11555 Rockville Pike
Rockville, MD 20555

SERVED DEC -4 1992

Dear Chairman Selin:

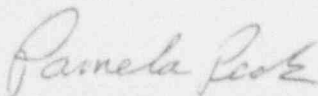
I am writing to urge the Commission to hold full a oral hearing on Transnuclear Incorporated's application (XSNM-02702) to export irradiated fuel from the Shoreham nuclear power plant in New York to Cogema in France for reprocessing. The Nuclear Control Institute, a public policy research group concerned with nuclear proliferation, filed a petition on October 30 requesting such a hearing.

The application reflects the first effort in more than a decade by a U.S. utility to reprocess spent nuclear fuel. If the application is granted, this could jeopardize nuclear nonproliferation interests by serving as a precedent for other U.S. utilities and could shore up a sagging European reprocessing industry.

Full review is particularly imperative in this case because the Executive Branch has not addressed any substantive issues raised by the application. I sincerely hope you and the Commission will give the serious issues raised by this license application the consideration they deserve, in the form of a full oral hearing.

Thank you for your attention to this urgent matter.

Sincerely,



Pamela Peck
2224 SE Brooklyn
Portland, OR 97202

Natural Resources
Defense Council1350 New York Ave., NW
Washington, DC 20005
202 783-7800
Fax 202 783-5117

'92 DEC -2 A8:35

December 1, 1992

Dr. Ivan Selin
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555OFFICE OF SECRETARY
DOCKETING SERVICE
BRANCH

SERVED DEC -4 1992

DOCKET NUMBER
EXPORT-IMPORT

11004597

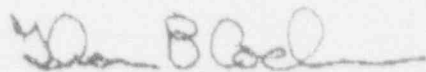
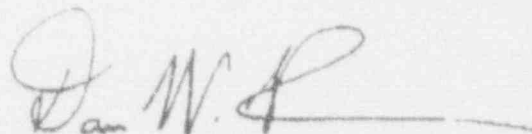
Dear Dr. Selin:

We are writing to support the Petition of the Nuclear Control Institute ("NCI"), filed October 30, 1992, seeking to intervene and requesting a hearing in connection with the application of Transnuclear, Inc. for a license to export irradiated fuel elements from the Shoreham Nuclear Power Plant to France for reprocessing (Lic. No. XSNM 02702).

NCI's Petition raises important questions, particularly about the precedential implications of the proposed export and the impacts associated with the return of high-level waste and separated plutonium to the United States for storage and disposal. NRDC believes that the most searching scrutiny of the license application is required, including a detailed analysis under NEPA, before the Commission takes any action. That scrutiny is best provided in a full public hearing, and we urge, therefore, that NCI's Petition be granted.

Thank you for your consideration of our views.

Sincerely,

Thomas B. Cochran
Senior ScientistDan W. Reicher
Senior Attorney

Facsimile Transmission Cover Memo

NATURAL RESOURCES DEFENSE COUNCIL

1350 New York Avenue, N.W.
Suite 300
Washington, DC 20005

VOICE Telephone: 202-783-7800
FAX Telephone: 202-783-5917
TCN/Dialcom ID : 141:TCN902
MCI Mail ID : 414-0393
IGC EcoNet ID : nrddc

TO: Dr. Ivan Selin

FROM: Tom Cochran

DATE: 01 December 1992 - 09:19 Eastern Time

NO. PAGES: 2 including cover

PROBLEMS?: Call 202-783-7800, ask for sender on "FROM:" line.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

TRANSNUCLEAR, INC.

(Export of Fuel Assemblies to France
License No. XSNM-2702)

Docket No.(s) 11004597

CERTIFICATE OF SERVICE

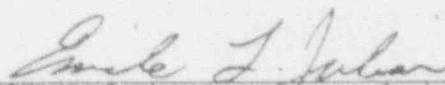
I hereby certify that copies of the foregoing 3 LETTERS TO COMM. COMMENTING have been served upon the following persons by U.S. mail, first class, except as otherwise noted and in accordance with the requirements of 10 CFR Sec. 2.712.

Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

James A. Glasgow, Esq.
Counsel for Transnuclear, Inc.
Newman & Holtzinger, P.C.
1615 L Street, N.W., Suite 1000
Washington, DC 20036

Eldon V.C. Greenberg, Esq.
Counsel for Petitioner, NCI
Garvey, Schubert & Barer
1000 Potomac Street, N.W., Suite 500
Washington, DC 20007

Dated at Rockville, Md. this
4 day of December 1992


Office of the Secretary of the Commission