



**Department of Energy**  
Savannah River Operations Office  
P.O. Box A  
Aiken, South Carolina 29802  
**DEC 21 2017**

Mrs. Nina Spinelli, Chairperson  
Savannah River Site Citizens Advisory Board  
P.O. Box A  
Aiken, South Carolina 29802

Dear Mrs. Spinelli:

SUBJECT: Citizens Advisory Board (CAB) Recommendation Number #350 – Oppose Receipt of German Spent Nuclear Fuel (SNF) for Treatment and Storage in the United States (US) (Your letter, dated 09/26/17)

Thank you for your recommendation regarding opposition to receipt of German SNF for treatment and storage in the US. The Department of Energy-Savannah River Operations Office (DOE-SR) does not accept your recommendation, and submits the following responses to each recommendation subpart.

CAB Recommendation:

- 1. Correct the deficiencies identified in the Background Section (above) in the final Environmental Assessment (EA).*

DOE-SR does not accept this sub-part. The deficiencies noted in the CAB recommendation letter involved whether a compelling purpose and need for the proposal had been identified. The Federal Republic of Germany requested help from the Department in 2012 regarding disposition of this SNF which contains United States (US) origin highly enriched uranium. The Department has been working to support that request with the understanding that the costs be borne by Germany. President Eisenhower's "Atoms for Peace" speech, set the stage for the loan of nuclear materials to other nations for peaceful purposes. It also mentioned the intention of "impounding, storage and protection of the contributed fissionable materials". As such, the Department is responsible for determining if this or any material is in the best interest of the US to be returned.

The second deficiency noted in the CAB recommendation letter involved whether the Department identified or evaluated all reasonable technological and siting alternatives if the material is brought to the US. The final EA will address these comments in detail. The US capabilities for receipt and management of SNF are concentrated at the Idaho National Laboratory and Savannah River Site (SRS). Between these two DOE sites, only SRS H-Canyon facilities are capable of conducting the processing envisioned for the decladding (i.e., graphite removed) of SNF from Germany. Other facilities at SRS were not evaluated due to the shielding requirements of the material, and the need for remote handling of the CASTOR casks/containers. Regarding the direct disposal option mentioned in the CAB recommendation, the storage cask for

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the German graphite SNF is not a qualified disposal container nor is there an existing SNF cask qualified for disposal of this type of spent fuel. As such, the Department believes all available alternatives were adequately evaluated in the Environmental Assessment, and a Finding of No Significant Impact was issued on December 20, 2017.

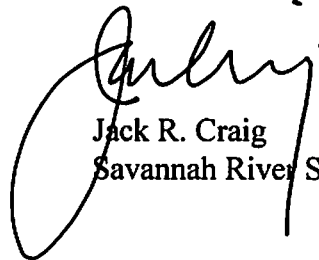
- 2. Prefer and select the "No-Action" alternative described in the Draft EA, i.e., not receive the German SNF for treatment and storage in the US.*

DOE-SR does not accept this sub-part. No decision on the acceptance of the German Graphite SNF has been made at this time nor would one be made until the technology has been fully matured and H-Canyon availability is affirmed (assuming technology development activities were to continue at SRS and be funded by the German government). As stated in the Statement of Intent, any decision to proceed with the project will depend upon the ability to comply with all applicable statutes, and regulations, and DOE requirements, and resolution of any technical, financial, and legal issues that may be identified.

The Department thanks you for your recommendation and values the CAB's position on the SRS programs, but it is not possible for the Department to accept these recommendations.

If you have any questions, please contact me or contact Tony Polk, of my staff, at (803) 208-2854.

Sincerely,



Jack R. Craig  
Savannah River Site Manager

NMPD-18-0007

cc:

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