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September 16, 2016

Ms. Cheryl Moss Herman  
U.S. Department of Energy  
Office of Nuclear Energy  
Mailstop B-409  
19901 Germantown Road  
Germantown, MD 20874-1290

Subject: Duke Energy Corporation Response to the Department of Energy's Request for Information Pertaining to the Management of Excess Uranium

Reference: Excess Uranium Management: Effects of DOE Transfers of Excess Uranium on Domestic Uranium Mining, Conversion, and Enrichment Industries; Request for Information, 81 FR 46917, July 19, 2016

Dear Ms. Moss Herman,

Duke Energy<sup>1</sup> (Duke) appreciates the opportunity to provide comments on the Department of Energy's excess uranium management efforts. We endorse the nuclear industry letter provided by Ms. Suzanne Phelps of the Nuclear Energy Institute to you on September 19, 2016.

We are encouraged that DOE recognizes the importance of predictable excess uranium transfers to the long term sustainability of the nuclear fuel market (81 FR 46,917); and commend the DOE for its recent transparency and predictability. Transparency and certainty are vital for end-users to develop and execute an economically prudent procurement strategy. Changes in expected supply can result in price movements that have the potential to destabilize the markets. We, therefore, continue to urge the DOE to communicate a strategy outlining the specific annual quantities of uranium to be transferred in the future, and once established, adhere to the strategy.

As emphasized in NEI's letter, the industry has paid its share of the funds necessary to clean-up legacy gaseous diffusion plants (GDPs). In the absence of Congressional appropriations, we oppose the reinstatement of the D&D fund as the industry has paid its share of the funds necessary for the clean-up of these facilities.

We appreciate the opportunity to provide input on these significant industry issues. Additionally, we believe that the transparent disposition of the U.S. Government uranium stocks is critical in establishing and maintaining an environment which ensures that reliable and cost competitive sources of fuel supply

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<sup>1</sup> Duke Energy is the largest electric power holding company in the United States, supplying and delivering energy to approximately 7.4 million U.S. customers in the Midwest and Southeast. Duke Energy is the second largest nuclear generator, by capacity, in the U.S. with 11 reactors accounting for 10,548 megawatts of generation.

will be available to existing and future nuclear power reactors. We would be pleased to discuss these comments with you in greater detail should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Culp". The signature is fluid and cursive, with the first name "David" and last name "Culp" clearly distinguishable.

David C. Culp  
General Manager of Nuclear Fuel Engineering