

**From:** [Meghan Belaski](#)  
**To:** [RFI Uranium Transfer](#)  
**Subject:** Fwd: Your Comment Submitted on Regulations.gov (ID: DOE\_FRDOC\_0001-3185)  
**Date:** Monday, September 19, 2016 3:26:03 PM

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Please see the attached comment submitted to DOE and use it as my public comment to this RFI. Wanted to make sure I had all the bases covered. Thank you.

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**Date:** Mon, Sep 19, 2016 at 1:15 PM  
**Subject:** Your Comment Submitted on Regulations.gov (ID: DOE\_FRDOC\_0001-3185)  
**To:** [meghan.belaski@gmail.com](mailto:meghan.belaski@gmail.com)



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**Agency:** Department of Energy (DOE)

**Document Type:** Rulemaking

**Title:** Requests for Information: Excess Uranium Management: Effects of DOE Transfers of Excess Uranium on Domestic Uranium Mining, Conversion, and Enrichment Industries

**Document ID:** DOE\_FRDOC\_0001-3185

**Comment:**

I'm commenting today because I believe the DOE should do whatever it takes to subordinate the uranium industry to its directive on these matters.

My understanding is that this uranium transfer will down blend dangerous and potentially lethal HEU to LEU, which is always a win with the constant reminder of the constant threats we are allegedly under, you know, from ISIS, Russia, North Korea, etc., and also provides desperately needed funding for cleaning up "legacy" federal nuclear facilities, which is also a win when some of these sites have been contaminating communities for decades waiting for funding, and the lead role of the privatized uranium industry in contaminating the same sites they now want to prevent from receiving funding for clean-up, and halt plans for down blending dangerous material in order to support a technology that does not exist, borders on ludicrous, and the DOE needs to maintain as much oversight of these materials as possible, and dictate policy to the industry, not the other way around.

Harry Anthony, President of the Uranium Producers of America, suggested in an April 25 2016, article published with [prnewswire.com](http://prnewswire.com), that while the UPA recognized "these cleanup

projects are important, they should be funded in the regular appropriations process, and the DOE should cease further uranium transfers until the market recovers". That's almost funny. Mostly because the uranium market will never recover, but not because the DOE is converting HEU to LEU, it's because the industry has been mandated by an all or nothing prerogative for decades and now the nothing part is catching up.

If Harry Anthony wants to take these materials to his community and wait for funding in a "regular" appropriations process, by all means. Seriously. Go ahead Harry. See how long it takes Congress to hook your community up. Some of us have only been waiting for 25 years or so. Like a lot of us, you'll probably die from the cancers you get living by this material waiting for funding for cleanup.

Or you could just wait and see If the currently unproven "technology" of advanced and small nuclear reactors ever comes to fruition and then you can you count on these dangerous nuclear materials being remediated from your community. But that's not a gamble any sane person would opt for, so why are you opting for this outcome for the rest of us? You want our legacy sites to wait for Congress to act and/or advanced nuclear reactor designs and technology years away from any meaningful development to catch up with 70 years of nuclear wastes and contamination around the USA? No thanks.

Sudafed is more controlled and regulated than dangerous and potentially lethal nuclear materials that really should have no place in a free-market, and any chance to remove unnecessary HEU from the market is a win for peace and a loss for any potential terrorist cell operating right now. We don't have time to wait for technology that does not exist to deal with these materials, and any opportunity to make them less dangerous on a global scale should always be taken.

The uranium industry cannot ask the DOE to manipulate the market to suit industry imperatives and plans for the future over the demands of today. The time to act is now. Which includes funding the clean-up of sites that are lethal and imminent threats to human health that Congress has failed to properly fund for decades. All this in order to benefit the same industry now trying to convince the public and the DOE that we should just wait a little longer for a bigger, better plan, that seemingly benefits only the uranium industry, but not the legacy sites, the communities affected by those sites, or our collective national security in removing lethal nuclear materials from the global market that could be used on American soil in a terrorist attack, all in the name of the uranium market.

As a side note, the documented and criminal history of the "industry" in communities like St. Louis, Missouri, and Canon City, Colorado, from Cold War 1 and 2 apparently, are not considered "legacy" sites even though illicit and highly controlled, and not supposed to be there Manhattan Project materials have been detected in significant quantities in both communities, clearly underscores the potential for mismanaging and manipulating nuclear materials, and not removing HEU from the market is a far greater concern than what may or may not happen to the uranium market, and waiting for a technology that does not yet exist, by those advocating for the DOE step-back and let the industry dictate what happens with these materials is not an option I would advocate for as a private citizen. I request the DOE to take whatever steps possible to remove HEU from the uranium market and introduce more LEU to the market and fund as many legacy sites that have been left to rot around the USA by the very industry that is now asking the DOE to halt the entirety of this process. Thank you.

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