



HITACHI

GE Hitachi Nuclear Energy

Caroline Reda
President & CEO
GE Hitachi Nuclear Energy

3901 Castle Hayne Road
P.O. Box 780
Wilmington, NC 28402
USA

T 910-819-3900
F 910-362-3900

July 1, 2011

Mr. Timothy A. Frazier
Designated Federal Official
Commission on America's Nuclear Future
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Comments submitted in accordance with 75 FR 25850, July 1 2011, via
CommissionDFO@nuclear.energy.gov

Dear Mr. Frazier:

GE Hitachi Nuclear Energy ("GEH") appreciates the opportunity to submit comments to the Blue Ribbon Commission ("BRC") on its Disposal Subcommittee ("Subcommittee") Draft Report.

To better address waste disposal, GEH agrees with the Subcommittee's draft conclusions that (1) the United States of America ("U.S.") needs one or more geologic repositories, regardless of path taken with technologies and type of repository needed; and (2) a new approach to siting nuclear waste facilities is needed that better involves local stakeholders and is less dependent on short-term legislative action or approval.

GEH agrees with the Subcommittee's draft conclusions that there are advantages to the creation of a new, single-purpose organization to manage nuclear waste, such as the so called Federal Corporation ("Fed Corp"), which would not be part of the U.S. Department of Energy ("DOE"). We are also supportive of constructive amendments to the Nuclear Waste Policy Act of 1982 (42 U.S.C. §10101 et seq., as amended) to better improve processes consistent with BRC recommendations. As the Subcommittee has observed, it is important for the federal government to "make good" on its commitments for waste management (Subcommittee Report, page 17). We further agree with the Subcommittee's assertion that establishing a Fed Corp should not delay other positive action that can be taken in the near-term, and we feel this is important for establishing confidence that substantive improvement can follow directly from BRC recommendations.

The new Fed Corp, as proposed in the draft report, explicitly excludes responsibility for advanced fuel cycle research, development, and demonstration. The report advises that the “[r]esponsibility for generic research in areas such as alternative disposal methods and advanced fuel cycle and waste form options should remain with DOE and private industry and should continue to be funded by general appropriations and by industry funds.” (Subcommittee Report, pages 32-33) As the Fed Corp concept is explored, it is important to note that it is only through clear policy and potential public/private partnerships that industry will be motivated to invest significantly in this type of generic research and development. Since nuclear waste disposal is a federal responsibility, industry will look to federal policy to determine the potential demand for highly advanced technologies that can improve the ability to dispose of nuclear waste. Therefore, fuel cycle research and development should be permitted within the scope of the Fed Corp to the extent that it furthers its objectives for nuclear waste management and disposal.

We thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Caroline Reda". The signature is written in a cursive, flowing style.

Caroline Reda, President and CEO
GE Hitachi Nuclear Energy