N A R U C
National Association of Regulatory Utility Commissioners

June 29, 2011

Honorable Lee Hamilton
Lieutenant General Brent Scowcroft
Co-Chairmen
Blue Ribbon Commission on America's
Nuclear Future
1000 Independence Ave. SW
Washington, DC 20585

Re: Comments on Draft Subcommittee Reports

Dear Co-Chairman Hamilton and
Co-Chairman Scowcroft:

The National Association of Regulatory Utility Commissioners (NARUC) maintains deep interest in the work of the Blue Ribbon Commission to help, as the preamble of the Transportation and Storage Draft Recommendations says, "provide a comprehensive framework for putting the U.S. nuclear waste management program back on track."

While it has been a struggle to implement the Nuclear Waste Policy Act, as amended, as the Commission heard from numerous direct participants and stakeholders, one of the most important lessons learned was that calendar milestones should not be written into legislation nor should they be written into contracts, especially for a first-of-a kind endeavor like a geologic repository that required regulatory compliance for millennia. The essence of the Commission's work is that the Yucca Mountain experiment is a failure and you and your distinguished colleagues have studied the situation and are going to suggest ways to find a more "workable option" for at least one repository at a new location.

It is our belief that the Yucca Mountain site has yet to be determined to meet or not meet the safety and other regulatory requirements set forth in the NWPA and other applicable laws. We agree with the decision of the NRC Atomic Safety and Licensing Board (ASLB) made ONE YEAR AGO TODAY that the Secretary of Energy lacks the authority to withdraw the Yucca Mountain license application and that the NRC must review the application once a qualified application is properly before the ASLB. As the ASLB stated, "DOE may not single-handedly derail the legislated decision-making process by withdrawing the Application." It remains unclear whether the NRC commissioners will sustain, override

or do anything about the ASLB decision denying the motion to withdraw or whether the matter will be settled in federal court.

Our comments on the Draft Subcommittee Recommendations regarding disposal are conditioned upon the BRC's verbal instructions from the Secretary of Energy that "Yucca is off the table." We prefer the approach in your May 27 letter to the House Energy and Commerce Committee that the Commission "neither includes nor excludes Yucca Mountain as an option." We support consolidated interim storage, especially for spent fuel from shutdown reactor sites, but find the "flexibility" as to quantity, duration and site means that we would be unable to determine the effect on fee requirements if the Nuclear Waste Fund is authorized to pay for storage.

We are intrigued by the proposal to create a new nuclear waste management organization along the lines of a federal corporation and look forward to more details. With the abolishment of OCRWM, a new organization will be needed for whatever path is chosen.

Finally, as the NARUC representative told the Commission, regardless of what disposition strategy is recommended, it must include a more stable funding source. Your reports do a good job of recognizing the need for reform of the Nuclear Waste Fund and attempt to cut through the thicket of fiscal constraints that were not envisioned when the Fund was established by NWPA. We think the matching of fee revenue collection to annual appropriations and escrowing the balance for later payment might be a workable approach than the present 100 percent diversion (in FY 2011 and 2012) of the estimated $770 million in total fee payments to the Treasury. We are not optimistic that saying the Disposal Subcommittee, "strongly recommends that those responsible for management of the budget process and rules in the Administration and Congress devise a workable means to ensure that, *in the long run*, the corpus of the NWF is available to meet the annual cost peaks that will occur..." (emphasis added) is sufficiently forceful. We would prefer more direct language be used, such as:

> If we are to be serious and expect successful management and disposition of nuclear waste over a hundred year or longer period we must demonstrate that seriousness by setting a good faith repayment schedule for the corpus of the Nuclear Waste Fund and all accumulated earned interest to the new nuclear waste management organization within ten years of its establishment. Alternatively, substantial repayment could be keyed to a significant milestone.

Thank you for this opportunity to comment. We look forward to the Commission's Draft Report.

Sincerely,

David C. Boyd
Chairman, Nuclear Issues Subcommittee

NARUC Comments on Draft Recommendations of the Transportation and Storage Subcommittee

Recommendation #1

We reluctantly agree with the recommendation to expeditiously establish one or more consolidated interim storage facilities for spent fuel. We say reluctantly, because the premise is that the repository will not be developed at Yucca Mountain and, as we commented about the Disposal Subcommittee recommendation that the new used fuel management organization is urged to have a more open and consultative site development process with no fixed milestones, that likely means it will be decades before another repository becomes licensed to receive waste.

NARUC has urged DOE to consider central interim storage since the time it became apparent that the Yucca repository would not be ready to accept waste shipments by January 1998. DOE refused any attempts to provide relief for the reactor owners other than litigation over breach of contract. Even after the courts agreed the government is liable for damages due to delays, the damage award payments and settlement agreements were all paid from the Judgment Fund with no punitive effect on DOE.

The report gives no estimate of quantity of used fuel to be stored at consolidated storage facilities. It also is not specific as to how long the material would be stored. The discussion at the May 13 BRC meeting did not answer the question of "How long is 'interim?'" There seemed to be unanimous agreement during the Subcommittee hearing in Maine that the used fuel stored at nine shutdown reactor sites should be removed to a consolidated storage site. According to a 2008 DOE study there is 2,813 metric tons at those sites. The Subcommittee report looks ahead to more reactors being decommissioned after their service lives end, even with license extensions. Consolidated storage would also provide some flexibility for a contingency of used fuel for instances where a post-Fukushima evaluation warrants relocation.

We commend the Commission for what appears to be original work at a holistic evaluation in Section 5 of cost of storage at reactor sites—being initially incurred by the owners, but either through damage awards or through negotiated settlement agreements ultimately paid from the Judgment Fund and taxpayers—and how a consolidated storage cost might compare with the status quo. We have not had the time yet to study the referenced EPRI and MIT studies, but they should be of interest to Congress when it considers adopting the recommendations of the Commission in the coming months.

It may pose some difficulty maintaining the "flexibility" of an indefinite quantity of used fuel to be stored for an indefinite time at a consolidated storage facility. Potential host communities

are going to want definite answers to the quantity and duration questions and be assured of a decommissioning plan as well its financing. We sense there will be some phasing of storage requirements, but the communities will expect to see the maximum foreseeable storage figures, per federal NEPA guidelines even if the first phase is a lesser level that DOE or the new organization wants to proceed with as an initial increment.

Can we conclude that the overall "mass diagram" of spent fuel is that once spent fuel is placed in dry cask storage at reactor site ISFSI, it will stay there until it is to be sent to a repository or for reprocessing? That as cooling pool capacity is managed, the spent fuel that is removed will continue to go into on-site dry cask storage until a consolidated storage facility has capacity to have it be sent there? The flow of spent fuel to the repository may depend on whether there are requirements for transfer to standard canisters or whether the repository receipt facilities can accommodate the various containers currently used by nuclear plant operators. In 2005, DOE introduced the plan to shift to the TAD canister to reduce site investments and worker exposure, but seemed to move the transfer problem to the points of origin. These kinds of questions point out the need for an integrated used fuel management approach.

The reason for our curiosity is that, even though the report suggests some net cost savings (to the government) by development of one or more consolidated storage facilities and that the Commission believes that authority exists under the MRS provisions to use the Nuclear Waste Fund, we would naturally ask, "How does this added storage expense affect the one mill fee?" We see no estimates for total life cycle cost for the storage proposal and, other than a cost estimate for Yucca Mountain we do not have a figure for a repository. Other than intuition, we must conclude that the future fee for the Nuclear Waste Fund (or its successor) is a "known unknown."The Commission's Charter calls for the reports to include "Recommendations on the fees currently being charged to nuclear energy ratepayers..." We do not see how that can be done and there is no indication in either of the Subcommittee reports that there is a plan to do so.

There are allusions in Section 6 to the availability of various incentives being a means of attracting potential host communities for the consolidated storage facilities. There are provisions in NWPA for financial benefits (that would likely warrant a liberal adjustment for inflation) payable from the Fund. The suggested co-locating of research and demonstration facilities might also be attractive, but we do not see them to be appropriate uses of the Fund.

While these comments raise many questions, we offer them for consideration in the final report. Our main point here remains to support the goal of developing consolidated interim storage while concurrently pursuing development of a geologic repository. We would like to know more about quantities and duration of storage and how the total cost of development and operations will affect the Nuclear Waste Fund fees.

Recommendation #2

It is a major disappointment to ratepayers (who even realize it) that they have been paying, via their nuclear utilities, since 1983, so their government would develop a repository in which spent fuel could safely be deposited only to be told in 2009 that the site previously agreed by Congress and one President is considered by the next President to not be a "workable option." Now, this recommendation gives a new label of "dispersed interim storage" to the continuation of the status quo that could go on for 100 years or more, while costing ratepayers a second time as taxpayers bearing the cost of the government's inaction.

While we are familiar with the studies and the careful regulatory controls that support the assertion of this recommendation that there are no unmanageable safety or security risks of both pool and dry storage, that does not mean there are not people—especially following the events in Fukushima—who are still fearful of continuing spent fuel storage near them.

Recommendation #3

We fully concur that the spent fuel from the decommissioned reactor sites should be first in line for shipment and storage at a new consolidated storage facility. We would hope the parties to the standard contracts involved can reach an agreement to enable that change.

The House Appropriations Committee markup of the Energy and Water Development Appropriations bill for Fiscal Year 2012 supports the basic notion of development of a central interim storage facility for relocation of the spent fuel from decommissioned reactors and directs DOE to submit a plan to enable that with the Fiscal Year 2013 budget request. Since that budget will be formulated before the Commission's final report is complete, we urge the Commission to endorse the inclusion of the aforementioned plan to the Secretary of Energy in the FY 2013 along with a nominal funding request to begin initial planning.

Recommendation #4

We expressed general support for the notion of the proposed, single-purpose federal corporation in our comments on the Disposal Subcommittee recommendations. Further, we agree that while getting authority and forming the new organization will take time, DOE should not miss an opportunity to meet with and encourage interest of communities and/or private sector interests in hosting or developing a storage facility.

The Commission may know more than we do about the organization within DOE to take the preliminary steps to implement this recommendation, including developing design studies and working with the nuclear industry and NRC on standardizing dry cask storage systems, but it will take some leadership to summon the motivation and resources to get any results.

Recommendation #5

We salute the intent to embrace and practice the science-based, consent-based, transparent, phased and adaptive siting and development approach for the consolidated storage facilities that may be applicable for the repository siting. Patience and flexibility take time but may get better results.

Recommendation #6

Agree that the regulation, planning, coordination and operations in transport of spent fuel has been and must continue to be done with the diligence and skill that have compiled an outstanding safety record to this point. We have seen the successes of WIPP and indications that DOE and the States were working together toward similar results for the repository program.

It has been observed that the public is often fearful of the risk they are prepared to believe that transportation of any form of nuclear waste poses to them. It is often brought about by news media articles advising if not alerting the public that waste shipments are planned for certain routes. There are instances of efforts made by organizations to exploit the public's pre-disposition to be fearful of nuclear materials or their transport. When there were presentations in Nevada and in other States during the period of the Draft EIS public hearings, State of Nevada had highly credentialed transportation experts give testimony that great quantities of nuclear waste were going to be shipped along routes in the jurisdiction of the hearing sites that had a worst case scenario forecast to them that did not be reconciled with what DOE forecast in the Draft EIS. But at a NEPA public hearing there are no rebuttals or corrections. The press covers the hearing and reports on what is of interest.

It may be too much to expect, but It would seem to be beneficial and in the public interest to "educate the public" on nuclear waste transportation facts. But as the BRC heard in the Subcommittee and Commission hearings, there is the question of trust and distrust. While DOE drew positive recognition through the Transportation External Coordination Working Group is set up among State and regional radioactive materials transportation organizations for coordinating Yucca Mountain transportation, DOE generally was barraged by a steady stream of objections to transportation from the public as a review of the editorial cartoon archives of the dominant newspaper in the State would make plain. But what organization would be trusted to educate or refute the distortions? DOE shied away from that role—and may have had its objectivity questioned anyhow—because up until 2002 OCRWM was cautious to not be considered a Yucca advocate until the site was approved. The NRC has a well-drawn line between nuclear regulation and any activities or statements that could be seen as promoting nuclear operations. The nuclear industry does general promotion of nuclear activities, but

would perhaps be viewed as self-serving if attempted to take the lead role in telling the waste transportation story itself.

The National Research Council performed a useful service with its 2006 *Going the Distance* report, but it hardly is a best seller at the National Academies Press. Perhaps a condensed version should be sent to every newspaper publisher. Transportation will be an issue in consolidated storage, in geologic disposal and recycling scenarios. We can use more truthtellers and more journalists to do the fact-checking before they write the story.

Recommendation #7

We agree the new organization should have assured access to the entire Nuclear Waste Fund, with appropriate oversight, regular audits etc. Likewise, the parties to the waste acceptance delay litigation should be encouraged to find ways to reach settlement agreements.

If the Commission is recommending a consolidated interim storage program for as much as 100 years or more to "preserve options" it seems to us that is a significant change from the disposal in a geologic repository that was to have begun in 1998, and we feel that storage of that duration is beyond "incidental to disposal." Nor should it be rationalized as a reincarnation of Monitored Retrievable Storage. If there is ambiguity of whether what is proposed is among the uses listed for the Fund, it seems appropriate to seek and obtain explicit authority to take this deviation from the 1982 course set forth in the NWPA. That straighter path had the predicate that, "The government will dispose of the nuclear waste produced in the production of the nuclear power you used and you will pay for its disposal." The Commission calls for transparency in the siting process. That should be the case with the storage decision, as well.

The bottom line basis for consolidated storage seems to be that Congress told us in 1982 that disposal in a suitable place would be fairly chosen, licensed, built and ready to begin in sixteen years, but in 2009 the President decided that site is "not a workable option." So, now some waste will remain where it is at reactor sites and some waste will be removed and stored at a consolidated facility that will be more secure and economical. Meanwhile, a re-vitalized and integrated nuclear waste program will concurrently begin the process that will lead to development of a permanent repository that is:

- ✓ Consent-based
- ✓ Transparent
- ✓ Phased
- ✓ Adaptive
- ✓ Standards and science-based.

Those who will ultimately be asked to pay for the added consolidated storage are being told that the consolidated storage is being developed to "preserve options" whether building one or more repositories or possibly recycling some decades from now. Yet, other than the nine decommissioned sites, no one can say for sure if used fuel will remain where it is in "dispersed interim storage" or have some of it chosen for removal and delivery to one of the consolidated storage facilities. There may be a problem with equal payments but unequal benefits, that is some will have (a portion) of their spent fuel removed from their site and others may not, but all will pay. We will review more closely the commissioned study by Hamal, Carey and Ring on Spent Nuclear Fuel Management to gain a better appreciation of some of the options that study evaluated.

NARUC Comments on Draft Recommendations of the Disposal Subcommittee

Preamble

We sense throughout the reports and the draft recommendations reference to the "possible need for additional legislation or amendments to existing laws," including NWPA, as though the Commission might prefer to avoid that. In our view, if the termination of Yucca Mountain is sustained, since the 2002 Joint Resolution (P.L. 107-200) approved Yucca Mountain as the repository site, contingent upon successfully being licensed by the NRC, then the Resolution should be nullified by Congress. Further, we believe that the proposal to develop consolidated central or regional storage of spent fuel for "a century or even longer" represents a significant departure from the intent of NWPA and should be explicitly authorized rather than be considered "incidental to final disposal" for that long.

Recommendation #1

We agree with the central point that "it is time to begin developing and implementing integrated, workable solutions that include interim storage and disposal of spent nuclear fuel and high-level radioactive wastes."

Recommendation #2

With the disbanding of the statutorily directed Office of Civilian Radioactive Waste Management, whatever organization is assigned to implement the recommended integrated used fuel management activities will be new. We find the listed benefits of creating a new, single-purpose organization in a federal corporation outside of DOE to be appealing in concept. Other countries have found the single-purpose organization serves their needs. Here is another instance where legislation seems necessary. Many details need to be carefully considered to provide the mission focus, ability to gather and apply resources and have sufficient independent authority subject to oversight. As major stakeholders on the disposal program, State utility regulators and NARUC will be greatly interested in specifics of the proposed organization. Attention should also be given to some assistance in forming the new organization by either DOE or another federal agency. Perhaps cooperative arrangements can be made to get loaned executives from the nuclear industry to help get the new organization up and running.

Recommendation #3

Ensuring access for the new organization to both the corpus of the Nuclear Waste Fund as well as the fee payments to the Fund is of paramount concern to NARUC and we stand ready to assist in tackling the realities of bringing that about. We found it troubling, if realistic, to hear

seasoned members of the Commission express the view that the corpus, now in the $25 billion range and, absent any appropriations for at least three years growing at about $2 billion per year, may never be made available for this programs. Others say the money in the Fund represents an obligation backed by the full faith and credit of the United States. No one is saying that the entire amount needs to be handed over to the new organization on its initial commissioning, although that would provide evidence of serious intent and would help recruit seasoned executive leadership to build the new organization. However, we cannot overstate how important it is that money in the corpus that came from ratepayers for waste disposal be made available for its intended purpose. Ideally, the enabling legislation could set some repayment goals such as completing the transfer of the NWF within five to ten years.

The discussion describes the federal fiscal landscape and how fiscal rules applied subsequent to enactment of NWPA creating the Nuclear Waste Fund with the clear intent to serve as a trust fund but have imposed impediments of one sort or another. Also, the report and the commissioned paper on budget and financial improvements describe the handicap to program stability of relying on annual appropriations (and frequent continuing resolutions) for a long-term capital project. Like 99.99 percent of Americans, our eyes glaze over at the presentation on the applicability of PAYGO and scoring in which through some Catch 22 rules the program may have to identify offsets elsewhere in the budget to get back the money that was collected and deposited in the NWF. It is our belief that the "surplus"money was spent on other uses and a stack of IOU's left in what we are to believe is $25 billion exclusively for the spent fuel disposal program if a future Congress appropriates any of it. Elsewhere in the reports there are discussions about the distrust that played a role in the repository and transportation history, but trust is a factor in the Nuclear Waste Fund history and in the future as well.

We understand the concept of the proposal in Section 6.4 for near-term administrative action to modify the existing standard contracts with nuclear utilities to pay that portion of the fees to the NWF that corresponds to the total aggregate fee payments that match the appropriations from the Fund in that same year and retain the balance in escrow to be paid at a later time when cash requirements exceed annual fee revenue. It would serve the same objective of the proposal NARUC made in 2009 to suspend fee payments during the hiatus in the disposal program during the period in which DOE requested zero appropriations pending the adoption of a new plan developed by this Commission. It reduces the amount of surplus payments to the Fund that goes through the figurative one-way valve. As we understand it, the parties to the standard contracts would have to agree to the change, as would OMB, CBO and the Budget Committees of both houses of Congress. Several State utility commissions have looked into establishing escrow accounts to enable withholding fee payments altogether in view of DOE's established status of being in partial breach of the standard contracts. Utilities showed great reluctance to withholding fee payments lest they be found in breach also.

To simplify our objective regarding the Nuclear Waste Fund, NARUC would like to wind back the clock to 1983 when the Fund was established for the purpose of collecting fees from those who benefited from nuclear energy to cover the waste disposal services that the government was going to provide. If a new used fuel management corporation is to be formed and take responsibilities presently assigned to the Secretary of Energy, then the Commission should provide a detailed roadmap on how to transfer the fee collection, managing and disbursing functions and to arrange for the eventual transfer of the reported balance in the Fund to the new organization. Somehow, the Commission or some transition overseer such as the Secretary of Energy or Secretary of Treasury will need to work with Congress on planning and implementing the shift.

If a new organization is not to be established, the reform measures for re-establishing a connection between fee revenue and appropriations are still needed. Somehow there should be some way to separate the capital-type expenditures for the investments (such as construction of either storage or repositories) from the funding of waste activity expenses.

Chapter 6 is well researched but as we interpret it, there are still some options on how the financing arrangements might be changed. We can understand the goal of trying to seek approval of the fee-splitting and escrow changes with the FY 2013 budget proposal, but do not know what organization within DOE is going to champion the proposal through the budget formulation and review process[1].

Recommendation #4

It is easy to agree with the five listed ways in which siting both storage and repository facilities should be approached. Chapter 7 captures many of the lessons—good and bad—from the Yucca and WIPP endeavors as well as the successes in Finland and Sweden in achieving public acceptance. We have found the *One Step at a Time* approach fostered by the National Research Council of staged repository development to be appealing as long as the steps move the country forward toward a national nuclear waste strategy goal. But, as the Subcommittee acknowledges, taking the open, almost partnered approach to siting will take time. Certainly, there seems to be a lesson in the manner in which the site search plan set forth in NWPA was truncated by the 1987 Amendment that chose Yucca as the sole site for further evaluation.

[1] For that matter, we could make an equally strong case for seeking authorization clarification through the FY 2013 budget process that DOE can and should take some preliminary steps to "get the ball rolling" with planning for a consolidated storage facility for the spent fuel now stored at shutdown reactor sites—since DOE heretofore said it lacks authority to store such fuel. There is very nominal funding involved.

Recommendation #5

We believe the NRC is the qualified and appropriate agency to set the regulatory requirements, including radiation standards for all nuclear facilities, including repositories. EPA seems to be involved in a wide range of controversial environmental regulations and seems to be stalemated by legal challenges such that taking 25 years to get a final radiation standard for Yucca Mountain may not have seemed that unusual in the EPA benchmark, whereas NRC might have had more timely results. EPA input should be invited and respected but the NRC should be responsible for the regulations.

We applaud the call in Sec. 8.1.6.3 for the "repository safety case to include a narrative and be constructed so as to be understandable to the educated, interested observer who may not be a subject expert." The same could be applied to whatever radiation standard is developed.

Recommendation #6

As a State-based organization, we are proponents of having States free to attempt to solve problems in a way that works best as determined by the State and local governments. With the Atomic Energy Act and NWPA, however, the policy was set such that the federal government is in charge of finding a national solution (geologic disposal) rather than have the generators of commercial spent fuel in 72 sites in 33 States each have to develop their own repository. Since geologic conditions are not uniformly distributed, it made perfect sense that we would seek two consolidated repositories, east and west.

We support bona fide respect for "meaningful consultation" by the federal government or federal corporation with State, tribal and affected local governments, including such establishment and involvement of advisory bodies such as the Environmental Evaluation Group at WIPP.

Recommendation #7

Concur that the Nuclear Waste Technical Review Board should be retained as a valuable and independent technical resource. While the Board maintained its focus on technical matters in the Yucca Mountain history, the periodic Board meetings—especially those held in Nevada—caused DOE to be more open with a public accountability than project officials were always comfortable with, but nonetheless served a useful purpose for stakeholders of all positions on the project. The Board also pressed DOE to have a more integrated look at waste storage, transportation and disposal.

NARUC Comments on Draft Recommendations of the Reactor and Fuel Cycle Technology Subcommittee

General

Given the complexities and uncertainty surrounding the question of closing the nuclear fuel cycle, we are not surprised that the highly distinguished members of the Subcommittee could not reach consensus on the issue. Our members, less familiar with the technical aspects, are instinctively drawn by resource conservation considerations, appreciate the economic questions and through the report have greater appreciation for the non-proliferation considerations.

With the many technology considerations for future reactors and fuel cycle alternatives, we would suggest that there be a cautionary note inserted into the draft report that the same kinds of issues raised in the other Subcommittee reports on trust, fear and opposition apply to a siting reprocessing facility complex and if there is going to be opposition to transporting spent fuel to a storage facility or a repository, it can be expected with transportation to a reprocessing facility. Or as one member of Congress, put it in his contribution to the 2002 Yucca Mountain debate, "Nuclear waste is unsafe where it is now, it is unsafe where it is going and it is unsafe taking it there." He could be disproven to the satisfaction of those who know more about the facts, but we must never discount the perceptions of risk felt by a broad segment of the population that is not interested in learning more about something they are ready to fear.

Section 3 and Table 5 are particularly well presented and should be of value to government and industry executives.

Recommendation #1

Agree with the recommendation, especially regarding R&D of waste storage. We are aware of the planning of the NRC to examine the technical basis for extended storage and have urged public engagement on safety evaluations. There has yet to be any wide-scale notification of communities adjoining nuclear plants that their government—and this Commission—considers that spent fuel may be stored where it is in "dispersed interim storage" for 100 years or more. That was not their understanding when the reactor was built nor was it what the understood when the NWPA was enacted.

Recommendation #2

No comment. With the immediate focus on discretionary spending cuts as a favored means to try to reverse the growth in federal debt, it will be challenging to acquire resources for needs that may not have returns for decades.

Recommendation #3

Perhaps there should be specific reference to developing regulatory requirements for reprocessing facilities. This may be underway as there are reports of potential applicants to build pilot operating facilities. There are some signs that some operators with experience with reprocessing believe there is sufficient market demand that they can build and operate a facility in the U.S. that also satisfies non-proliferation objectives with existing technology.

Recommendation #4

We have no comments, other than to express our appreciation for the well-written discussion of global non-proliferation concerns.