



Savannah River Site Watch

August 30, 2019

Freedom of Information Office
Savannah River Operations Office
P.O. Box A
Aiken, SC 29802

**Request for “Modification Number 6” to “Work for Others” Agreement between SRS and Germany, Concerning Processing of German AVR Spent Fuel at SRS;
Documentation on any Import of Graphite Balls to SRS**

To Whom it Concerns:

This is a request filed under the Freedom of Information Act, as amended. Per applicable law and Department of Energy regulations, I anticipate a response to this request within 20 days.

This request is being filed on behalf of Savannah River Site Watch (SRS Watch), a corporation duly registered with the State of South Carolina and a registered 501(c)(3) non-profit organization. In addition to many FOIA requests filed on behalf of SRS Watch, I have filed many FOIA requests with DOE on behalf of other non-profit organizations, including Friends of the Earth, the Alliance for Nuclear Accountability, Greenpeace and the Nuclear Control Institute.

I request that any fees that may be associated with this request be waived. The information obtained in response to this request will be used solely for non-profit purposes in South Carolina, the United States and Germany. The information will contribute to the public’s understanding of the manner in which DOE conducts its business and will specifically be used to inform the public about DOE’s efforts to import spent nuclear fuel from Germany. The information obtained via this request will be provided to not only the public but also the media, the Savannah River Site Citizens Advisory Board (a duly embodied federal advisory panel) and members of the German government at both the state and federal levels. Over the years, I have demonstrated an ability to use information gathered via FOIA requests in a manner so as to educate the public about DOE and issues it is addressing. I request that the fee-waiver standard that has been applied to my requests in the past be applied to this request.

This request is a follow-up to earlier FOIA requests on the same matter. For those requests, from which documents were obtained, no fee was charged.

If any claim is made that any portion of any located documents are sensitive in nature or meet FOIA exclusions, I request that redacted copies of such documents be provided to me and that a full explanation be provided as to the reasons for any redactions. I request that documents be provided to me as they become available to staff and that the documents not be withheld until all pertinent documents are obtained.

This request applies to research and development at SRS concerning spent fuel from two closed German commercial reactors - the AVR and THTR gas-cooled reactors, both of which used graphite fuel. The spent fuel from those reactors, contained in over 450 Castor casks, is now stored at facilities located in Jülich and Ahaus, Germany.

This request applies to DOE and any contractors working for DOE, including Savannah River Nuclear Solutions and the Savannah River National Laboratory (SRNL). This request applies to the DOE's Savannah River Operations Office and DOE's Office of Environmental Management.

I hereby request:

- Any modification to the original Work for Others (WFO) agreement between DOE/Savannah River Nuclear Solutions and Jülicher Entsorgungsgesellschaft für Nuklearanlagen (JEN) - located at the Forschungszentrum Jülich (FZJ) in Germany - and the Savannah River Site, Savannah River Nuclear Solutions and/or the Savannah River National Laboratory after March of Calendar Year 2018 or at any point in Calendar Year 2019. Modification Number 5 to the Work for Others agreement terminated on August 30, 2019, so this request covers any "modification" or new agreement subsequent to Modification Number 5. The requested modification(s) may be called Modification Number 6 (and higher).
- Any documentation on import of irradiated or unirradiated graphite fuel "pebbles" from Germany to SRS. (At the time of this filing, it is believed that JEN obtained initial permission to export 33 fuel pebbles but final permission had not been obtained from the Bundesamt für Wirtschaft und Ausfuhrkontrolle (BAFA) - the Office of Economics and Export Control.)
- Any reports from any SRS entity has provided to Germany under the most recent modified Work for Others agreement.

Please get in touch if you have questions about this request. Thank you for your timely response.

Sincerely,

Tom Clements
Director, SRS Watch