



Savannah River Site Watch

To: Members of the SRS Citizens Advisory Board & the Public

March 13, 2023

From: Tom Clements, Director, Savannah River Site Watch

Re: **Update on DOE plan to import highly radioactive spent fuel from Germany**

In a Finding of No Significant Impact (FONSI), dated December 2017 - https://www.energy.gov/sites/default/files/2017/12/f46/DOE-EA-1977-FONSI_FINAL.pdf - DOE committed to inform the CAB and the public about the status of the project to import highly-radioactive spent fuel from Germany for processing and disposal: "DOE will provide updates at the Savannah River Site Citizens Advisory Board meetings, and to other stakeholders, about the progress of technology development and any decisions on acceptance of the material."

As DOE has not met its obligation to provide updates, SRS Watch is now standing in for DOE. We will inform you of developments even though DOE has chosen not to do so, in violation of the FONSI.

The last agreement between SRS and JEN, the German entity holding a large portion the spent fuel, expired on February 28, 2023. (See "Work for Others" agreement: <https://srswatch.org/wp-content/uploads/2022/11/2022-02-21-WFO-13-021-Mod-No.-9-received-23-March-2022.pdf>. I encourage the CAB to ask DOE if a new agreement has been reached. SRS Watch filed a Freedom of Information Act (FOIA) request on March 1, 2023, asking for any new agreement and any communication between SRS and JEN about the status of the project. When we obtain any new documentation, we will inform the CAB. (SRS Watch FOIA request linked here: <https://srswatch.org/wp-content/uploads/2023/03/initial-FOIA-for-SRS-JEN-agreement-March-1-2023.pdf>

For many details on the import project, which involves import of graphite fuel from long-closed gas-cooled reactors, see the SRS Watch report *Auf Wiedersehen to DOE Nuclear Waste Dumping Scheme*, January 2023:

<https://srswatch.org/wp-content/uploads/2022/06/Auf-Wiedersehen-victory-on-German-spent-fuel-import-SRS-Watch-Jan-10-2023.pdf>

In order to avoid dumping of a large amount of radioactive waste at SRS – perhaps processed via H-Canyon and into the waste tanks - The SRS-JEN cooperation should be formally terminated by DOE. In any event, the withheld updates by DOE to the CAB should be provided.

I will raise this issue at upcoming CAB meetings and will anticipate a CAB inquiry on the matter and a DOE response.

I submit this memo – posted on the SRS Watch website: <https://srswatch.org/srs-watch-files-foia-request-on-german-spent-fuel-import-plan-agreement-to-import-spent-fuel-from-german-ended-february-28-2023-is-a-new-agreement-in-place/> - as a public comment for the March 13-14, 2023 CAB meeting and request that this memo be provided to CAB members and that it be made part of the meeting record.

Many thanks for your attention to this matter.

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<https://srswatch.org/>
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