

CINTAC

Civil Nuclear Trade Advisory Committee

March 14, 2024

The Honorable Gina M. Raimondo
Secretary
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Secretary Raimondo:

The Civil Nuclear Trade Advisory Committee (CINTAC) appreciates your leadership and support for America's civil nuclear energy. The Biden Administration's leadership shown in this area helps strengthen our economy, achieve U.S. climate change and clean energy priorities, bolsters U.S. competitiveness overseas, creates high-paying jobs, and strengthens U.S. energy and national security.

In response to Russia's unwarranted and illegal invasion of Ukraine, policymakers have determined that there is an urgent need for the United States to transition away from reliance on imports of Russian nuclear fuel. Recent commitments by the United States on the margins of COP-28 recognize the need for robust investment by reliable, Western suppliers in new uranium enrichment capacity that will be needed to facilitate this orderly transition. The \$2.7B budget appropriation provided by Congress supports this effort and further demonstrates U.S. leadership in this regard.

Congressional appropriations are tied to a requirement to remove Russian-supplied nuclear fuel from the U.S. market, with a goal of providing the certainty that the U.S. nuclear industry needs to support long-term fuel supply planning. If such legislation is passed, the Biden Administration should develop policies and procedures designed to facilitate a winding down of reliance on Russian uranium fuel supplies through 2028 as the United States invests in new domestic uranium enrichment capacity.

In this regard, the CINTAC offers the following suggestions for your consideration:

1. HR1042 has passed the U.S. House of Representatives and is under deliberations in the Senate. By its terms, Russian uranium imports will be banned from the U.S. markets. HR1042 also empowers the Secretary of Energy to develop procedures to issue waivers from this ban. In this context, we would encourage you work with the Secretary of Energy to develop waiver procedures that recognize that adequate uranium enrichment capacity to replace Russian supplies does not exist at this time.
2. The Department of Commerce possesses an immense amount of commercial data on the U.S. nuclear industry. CINTAC recommends that Commerce make this data available to the Department of Energy to help their development of a workable waiver process. The CINTAC believes that this data will demonstrate clearly that the waiver process must facilitate timely responses that provide long-term reliability and predictability to the U.S. market. In particular, waivers should be of sufficient duration to address the full cycle of procurement, production and transportation. In addition, CINTAC recommends that the Department of Commerce monitor the enriched uranium fuel market for any circumvention of sanctions on Russian supplies.

3. Finally, the CINTAC encourages you to work with the Secretary of Energy and other stakeholders to provide a waiver process that ensures a smooth transition to new supplies and is flexible enough to evolve over time and as market conditions develop.

The CINTAC believes that these recommendations will help ensure that a prohibition on Russian nuclear fuel from the market will minimize impacts to the U.S. nuclear industry while, at the same time, facilitate the development of a more robust uranium enrichment industry that leaves the U.S. industry in much stronger position to compete globally.

Sincerely and on behalf of the members of the CINTAC,



Ralph Hunter, Chair



Carol Berrigan, Vice Chair

cc: U.S. Secretary of State
U.S. Secretary of Energy
U.S. Secretary of Defense
U.S. Secretary of Treasury
National Security Advisor
Chairman, U.S. Nuclear Regulatory Commission
Director, National Economic Council
Director, National Security Council
Director, Office of Management and Budget
Chief Executive Officer, U.S. International Development Finance Corporation
Chairman, Export-Import Bank of the United States
Director, U.S. Trade and Development Agency

CINTAC Members:

1. Mr. Billy Mack, President and CEO, Accelerant Solutions
2. Mr. Craig Piercy, Executive Director and CEO, American Nuclear Society (ANS)
3. Dr. Hash Hashemian, President, Analysis and Measurement Services Corporation (AMS)
4. Ms. Colleen Deegan, Vice President and Manager, Bechtel Power Corporation
5. Dr. Danielle Castley, Founder & CEO, Becq
6. Mr. Glenn Neises, Nuclear Director, Burns & McDonnell
7. Mr. Joshua Parker, Director of Business Development, BWX Technologies, Inc.
8. Dr. Yassin Hassan, University Distinguished Professor and Director, Center for Advanced Small Modular and Microreactors (CASMR) at Texas A&M University, Center for Advanced Small Modular and Microreactors (CASMR)
9. Mr. Sean Oehlbert, Vice President, Corporate Business Strategy, Centrus Energy
10. Mr. Nicholas McMurray, Managing Director, Public Policy, ClearPath
11. Mr. Ralph Hunter, Vice President, Constellation Energy Generation, LLC, and President, Constellation Generation Development, LLC, Constellation Energy Generation, LLC
12. Mr. Gary Wolski, Vice President, Sales, Curtiss-Wright
13. Mr. Rod Baltzer, Chief Operating Officer, Deep Isolation
14. Mr. Colin Austin, Senior Vice President of International Business, EnergySolutions
15. Mr. Donald Hoffman, Founder/President/CEO, EXCEL Services Corporation
16. Mr. Jarret Adams, Founder and CEO, Full On Communications, LLC
17. Mr. Adam DeMella, Senior Vice President, Global Government Affairs and Policy, GE Hitachi Nuclear Energy
18. Mr. Brandon Brooks, Senior Manager, Strategic Business Development, General Atomics – Electromagnetics (GA-EMS)
19. Ms. Jackie Toth, Deputy Director, Good Energy Collective
20. Ms. Amy Roma, Partner and Global Energy Practice Area Leader, Hogan Lovells
21. Mr. Myron Kaczmarzky, Vice President, Holtec Government Services, Holtec International
22. Mr. Paul Amico, Director, International Industrial Practice, Jensen Hughes
23. Mr. Peter Hastings, Vice President, Regulatory Affairs & Quality, Kairos Power LLC
24. Mr. Seth Grae, President and CEO, Lightbridge Corporation
25. Mr. Paul Murphy, Managing Director, Murphy Energy & Infrastructure Consulting
26. Mr. Alex Polonsky, Partner, Morgan, Lewis, & Bockius LLP
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28. Ms. Carol Berrigan, Executive Director, Federal Programs and Supplier Relationships, Nuclear Energy Institute
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30. Mr. Clayton Scott, Executive Vice President, Business Development, NuScale Power, LLC
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33. Mr. Nathan Schukei, Sales and Business Development Manager, Rosemount Nuclear Instruments, Inc.
34. Ms. Marcia Burkey, Executive Vice President and Chief Financial Officer, TerraPower, LLC
35. Mr. Joseph Green, Chief Nuclear Officer, Thermal Engineering International (USA), Inc.
36. Mr. Alan Ahn, Senior Resident Fellow for the Climate and Energy Program, Third Way
37. Mr. Michael McMurphy, Senior Fellow, U.S. Nuclear Industry Council (USNIC)
38. Mr. Elias Gedeon, Senior Vice President, Commercial Operations, Westinghouse Electric Company