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January 22, 2015

Mr. David Henderson
United States Department of Energy
Office of Nuclear Energy
Mailstop NE-52
19901 Germantown Rd.
Germantown, MD 20874-1290

Dear Mr. Henderson,

Duke Energy Corporation¹ (Duke) appreciates the opportunity to provide comments on the Department of Energy's (DOE's) excess uranium management efforts. Duke is submitting the following comments in response to the DOE Request for Information (79 FR 7266I) issued on December 8, 2014.

Duke is in conceptual agreement with the nuclear industry letter provided by Marvin Fertel of the Nuclear Energy Institute to the Honorable Ernest Moniz, Secretary of Energy, on May 5, 2014 (attached for reference).

Transparency, schedule, and certainty of the amount of DOE material that will be made available are keenly important for end-users like Duke when developing a procurement strategy. Changes in expected supply can result in spot price movements that have the potential to reduce future supply and destabilize market fundamentals. Therefore, Duke urges the DOE to communicate a strategy with schedule for specified quantities of transfers and adhere to the strategy.

Duke recognizes that DOE has obligation to clean-up the legacy gaseous diffusion plants (GDPs) and that a lack of funding from Congressional appropriations can make it challenging to fulfill this obligation. We urge the DOE to be diligent with requests for Congress to appropriate sufficient direct funding to allow the clean up to proceed on schedule. Shortfalls in decontamination and decommissioning (D&D) annual appropriations do not justify disrupting the country's nuclear fuel supply. Regardless of the level of Congressional appropriations, we strongly oppose the reinstatement of any D&D fees given that nuclear generators have already contributed far more to the D&D Fund than has been spent on cleaning up the facilities.

¹ Duke Energy is the largest electric power holding company in the United States, supplying and delivering energy to approximately 7.2 million U.S. customers in the Midwest and Southeast. Duke Energy is the second largest nuclear generator, by capacity, in the U.S. with 11 reactors accounting for 10,548 megawatts of generation.

Duke appreciates the opportunity to provide input on this important industry issue. We believe that a sound approach to the disposition of the U.S. Government uranium stocks will help ensure that reliable and cost competitive sources of fuel will be available to our existing and future fleet of domestic reactors. We would be pleased to discuss these comments with you in greater detail should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Culp", with a stylized flourish extending to the right.

David C. Culp
General Manager, Nuclear Fuel Engineering

Attachment