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October 8, 2010

Hon. Scott Blake Harris
General Counsel, GC-1
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: U.S. Department of Energy Notice of Inquiry
on Convention on Supplementary Compensation for Nuclear Damage
Contingent Cost Allocation,
75 Fed. Reg. 43945 (Jul. 27, 2010) and 75 Fed. Reg. 51986 (Aug. 24, 2010)

Dear Mr. Harris:

On behalf of the Contractors International Group on Nuclear Liability (CIGNL), this is to request an extension to Tuesday, November 30, 2010 of the public comment period for reply comments to the U.S. Department of Energy (DOE) Notice of Inquiry (NOI) on the Convention on Supplementary Compensation for Nuclear Damage (CSC) Contingent Cost Allocation. 75 Fed. Reg. 43945 (Jul. 27, 2010) and 75 Fed. Reg. 51986 (Aug. 24, 2010).

CIGNL is an *ad hoc* nongovernmental group of major U.S. nuclear suppliers formed in 1993 to promote more widespread adherence to the international nuclear liability conventions and adoption of domestic nuclear liability laws. In particular, CIGNL actively promoted ratification of the CSC by the United States after it was signed in 1997, and enactment of implementing legislation after the U.S. Senate consented to CSC ratification in 2006. CIGNL has been working closely with the U.S. Government, the International Atomic Energy Agency and others to encourage more States to join this important Convention. CIGNL's current members are: The Babcock & Wilcox Company; Bechtel Power Corporation; ConverDyn; GE Hitachi Nuclear Energy, Inc.; Shaw Stone & Webster, Inc.; USEC Inc.; and, Westinghouse Electric Company LLC.

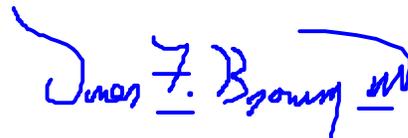
CIGNL has identified at least 27 points on which the DOE NOI invites public comments. The complexities of these issues are requiring even more careful analysis and coordination of comments than first anticipated. It is proving to be extremely difficult to propose a means to allocate the U.S. contingent cost among "U.S. nuclear suppliers," as now mandated by section 934 of the Energy Independence and Security Act of 2007. There is little or no data

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now available to identify which entities located in, or carrying out activities in, the United States have or are furnishing goods or services to foreign nuclear installations. For example, CIGNL so far has identified as many as 300 to 1,800 types of goods or services that go into constructing and operating a nuclear power plant. Notwithstanding the critical difficulties presented by the lack of data on the extent of and risk associated with the export of nuclear goods and services from the United States, CIGNL still is attempting to develop a possible approach to propose to DOE for establishing the CSC cost allocation formula. Having additional time to refine and coordinate positions among key U.S. suppliers is more likely to result in comprehensive and informed comments that will be of benefit to DOE in completing the complex task of developing a formula Congress has assigned to the Department.

CIGNL submits that the difficulties presented by developing informed comments on the DOE NOI warrant granting this request that DOE extend the public comment period until the Tuesday after Thanksgiving, *i.e.* November 30, 2010.

Respectfully submitted,

A handwritten signature in blue ink that reads "Omer F. Brown, II". The signature is written in a cursive style with a large initial "O" and a stylized "B". There are horizontal lines under the first and last names.

Omer F. Brown, II
Counsel for CIGNL

Copy to Section 934 Rulemaking@hq.doe.gov