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April 10, 2017

Ms. Cheryl Moss Herman U.S. Department of Energy Office of Nuclear Energy Mailstop NE-32 19901 Germantown Road Germantown, MD 20874-1290

- Subject:Duke Energy Corporation Response to the Department of Energy's Request for<br/>Information Pertaining to the Management of Excess Uranium
- Reference: Excess Uranium Management: Effects of Potential DOE Transfers of Excess Uranium on Domestic Uranium Mining, Conversion and Enrichment Industries; Notice of Issues for Public Comment, 82 FR 13,106 (Mar. 9, 2017)

Dear Ms. Moss Herman,

Duke Energy<sup>1</sup> (Duke) appreciates the opportunity to provide comments on the Department of Energy's excess uranium management efforts.

We endorse the nuclear industry letter provided by Suzanne Phelps of the Nuclear Energy Institute to you on April 10, 2017.

We are encouraged that DOE recognizes the importance of predictable excess uranium transfers to the long term sustainability of the nuclear fuel market (82 FR 13,106); and commend the DOE for its recent transparency and predictability. Transparency and certainty are vital for end-users to develop and execute an economically prudent procurement strategy. Changes in expected supply can result in price movements that have the potential to destabilize the markets. We, therefore, continue to urge the DOE to communicate a strategy with a specified quantity of transfers and adhere to the strategy.

We recognize that DOE is in a difficult position with respect to its obligation to clean-up the legacy gaseous diffusion plants (GDPs) and the relative lack of funding that Congress has appropriated for this task. We urge the DOE to request Congress to appropriate sufficient funding to allow the clean up to proceed on schedule. In the absence of Congress appropriations, we oppose any reinstatement of the D&D fund as we have paid our share of the funds necessary for the clean-up of the facilities.

<sup>&</sup>lt;sup>1</sup> Duke Energy is the largest electric power holding company in the United States, supplying and delivering energy to approximately 7.4 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.

We appreciate the opportunity to provide input on this significant industry issue. Additionally, we believe that the transparent disposition of the U.S. Government uranium stocks is critical in establishing and maintaining an environment which ensures that reliable and cost competitive sources of fuel supply will be available to existing and future nuclear power reactors. We would be pleased to discuss these comments with you in greater detail should you have any questions.

Sincerely,

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