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April 10, 2017

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

Submitted via email: RFI-UraniumTransfers@hq.doe.gov

Re: 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, Federal Register / Vol. 82, No.45 / Thursday,

March 9, 2017/ Notices

Dear Ms. Herman:

On behalf of Ur-Energy USA Inc. and its affiliates, we appreciate the opportunity to provide input regarding the Department of Energy's (DOE) management of the federal excess uranium inventory.

We acknowledge the importance of uranium transfers to fund the environmental cleanup of the Portsmouth Gaseous Diffusion Plant at Piketon, Ohio and the associated jobs. However, at the same time, we are deeply concerned that the uranium transfers, along with other factors, are contributing to the ongoing depression of uranium prices and the resulting loss of jobs in uranium producing states. For example, our company has experienced two rounds of layoffs over the last year and has significantly reduced production in response to low uranium prices. While it is difficult to determine the precise impact of DOE transfers on the market, Ur-Energy believes the economic evaluation performed by ERI, which shows harm to the domestic industry of \$5.70 per pound, is a reasonable estimate that should not be ignored.

Ideally, the cleanup at Portsmouth should be completely funded by Congress. Unfortunately, this solution seems unlikely for a variety of reasons. Therefore, to fund the cleanup at Portsmouth while minimizing the impact to the domestic uranium production industry, we ask that the DOE support and adhere to the management plan described in Title II, Section 203 of S.512 - "Nuclear Energy Innovation and Modernization Act" which is currently under consideration by Congress. Specifically, we ask that the DOE:

- 1. Develop a long-term Federal excess uranium inventory management plan that is updated at least every ten years and includes steps to minimize the impact on the domestic uranium mining, conversion and enrichment industries;
- 2. Maximize the benefit to the Federal government;
- 3. Limit the transfer, sale or other provision of natural uranium equivalent, in any form, between calendar years 2017 and 2025 to no more than 2,100 metric tons;
- 4. Limit the transfer, sale or other provision of natural uranium equivalent, in any form, after calendar year 2025 to 2,700 metric tons; and
- 5. Perform a market analysis as part of the determination process, when a determination is required, that is subject to a peer review process consistent with the guidelines of the Office of Management and Budget.

We appreciate the difficult task that DOE has been charged with to continue the important environmental cleanup at Portsmouth while at the same time minimizing the harm to the domestic uranium industry. We believe \$.512 provides a reasonable compromise that all sides can live with.

Thank you for your consideration,

John W. Cash Vice President