



May 19, 2000

The Honorable Michael Hustedt  
Green Parliamentary Spokeswoman for Energy Affairs  
The Honorable Angelika Beer  
Green Parliamentary Spokeswoman for Disarmament Affairs  
Bundestag  
Berlin, Germany

Dear Spokeswomen Hustedt and Beers:

In connection with the hearing you are conducting today on the proposal to export the uncompleted Siemens mixed-oxide nuclear fuel plant to Russia for fabricating excess weapons plutonium into reactor fuel, the Nuclear Control Institute wishes to convey its strong opposition to the plan on nuclear non-proliferation and nuclear safety grounds.

In 1995, we registered our objections with Green Party leaders to the original plan to fabricate Russian warhead plutonium into MOX fuel in the Siemens plant in Hanau for use in German power reactors. We were gratified that the Green Party led the opposition which eventually resulted in the rejection of the plan. Whether the plan operates in Germany or in Russia, its product would impose unacceptable dangers to the Russian people and the European Community, and to the international nuclear non-proliferation regime.

Beyond the considerable security risks associated with transport, processing and use of plutonium fuel, there would be significant additional hazards in the event of a severe accident at a nuclear power plant operating with MOX fuel rather than a full core of conventional low-enriched uranium. We calculate that an increase of 25 percent in latent cancer fatalities would result from such an accident with warhead-plutonium MOX fuel, and even this alarming consequence would be magnified further because of Russia's plan to mix reactor-grade plutonium, a more toxic form, into this fuel for the purpose of concealing the original isotopic composition of the military plutonium.

Given the high level of concern about the adequacy of security and safety measures in Russia, we believe it foolhardy and even immoral to export a MOX fabrication plant to Russia. Russia has made clear its intention to utilize MOX fuel on a large-scale commercial basis once the initial military plutonium disposition mission is completed. If fabrication and use of MOX fuel has now been rejected as too dangerous to pursue in Germany, the wherewithal to pursue such a program in Russia should not be transferred to Germany. The consequences of nuclear theft and of nuclear accidents do not respect national frontiers. Use of plutonium should now be minimized and eliminated, not expanded.

It is important to underscore the fact that disposition of excess military plutonium does not depend upon use of MOX fuel because this mission can be accomplished by immobilizing the plutonium in highly radioactive waste for direct disposal. Our preferred approach is vitrification---isolating the plutonium in heavy glass logs of highly radioactive waste. We do not favor an alternative approach of turning warhead plutonium into "bad" or "sub-spec" MOX, unsuitable for use in reactors but suitable for insertion in highly radioactive, spent fuel assemblies. Such MOX would have to be fabricated in a MOX plant, such as the Hanau facility, and the plant could be modified later on to fabricate "good" MOX suitable for use in reactors.

The best approach, we believe, is to serve the cause of both nuclear non-proliferation and nuclear disarmament by laying the Siemens MOX plant to rest once and for all. This plan should not be allowed to be resuscitated to provide the basis for a plutonium fuel program in Russia or to become a beacon to other nations that covet plutonium for civilian applications that too easily can turn military.

It is for this reason, as well as the important safety dividend of avoiding use of plutonium fuel in reactors, that the Nuclear Control Institute strongly opposes the MOX approach to military plutonium disposition in the United States and Russia, and appeals for bold German leadership to help attain this objective by rejecting the proposed export of the Siemens MOX plant to Russia.

Thank you for your consideration of these views, which we request be included in the formal record of the hearing.

Sincerely,

Paul Leventhal  
President



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