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Secretary, U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemaking and Adjudications Staff

REF: Docket ID NRC-2010-0372

The American Association for the Advancement of Science (AAAS) supports the American Physical Society's petition to the Nuclear Regulatory Commission (NRC) that would require that those seeking Nuclear Regulatory Commission approval of new uranium enrichment or plutonium reprocessing technologies provide a formal Nuclear Proliferation Assessment as part of their application. AAAS recognizes that new technologies can have far-reaching social consequences. New uranium enrichment and plutonium reprocessing technologies not only have safety and environmental consequences, but can pose a proliferation risk. All three consequences are within the NRC's regulatory purview.

Although the NRC states that the proliferation consequences of new technologies are assessed as the "net effect" of its entire review process, the AAAS believes that nuclear weapons proliferation is important enough to merit explicit attention in the NRC application and review process. Given the critical significance of nuclear weapons proliferation for U.S. and international security, it is reasonable to ask applicants for NRC licenses for enrichment or reprocessing technologies to address potential proliferation risks of their technologies prior to approval. Including a mandatory proliferation assessment as part of the NRC's licensing process will reinforce the U.S. commitment to non-proliferation and is consistent with the NRC's role "to protect the health and safety" of Americans, and we believe it is consistent with the AAAS objective of having public policy made with the best available technical input. Therefore, the AAAS urges that the American Physical Society's petition be accepted.

We thank you for the opportunity to comment.

Sincerely,



Alan I. Leshner