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No. of pages following 14

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FROM: _____

Comments:

October 5, 2000

Honorable William Jefferson Clinton
President of the United States
The White House
1600 Pennsylvania Avenue
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Dear President Clinton,

We are concerned that, subsequent to the climate talks in Lyon, the Clinton/Gore administration is poised to support allowing nuclear power to receive clean air credits through the Clean Development Mechanism (CDM) of the Kyoto Protocol. As a further blow to sustainable technology investment, your administration would not only allow nuclear power credits, but would also put it on par with truly sustainable energy sources such as wind and solar. Such a position is not only ill-conceived, but goes against the wishes of many individuals and organizations in "developing" countries who publicly have stated nuclear power should not be considered sustainable. This position would allow countries like the United States, Russia and Japan to receive credits for building reactors in other countries. All three of these countries have suffered serious nuclear accidents. **The Clinton/Gore administration must abandon this position at once and adopt a position that specifically excludes nuclear power from the CDM and Joint Implementation (JI) of the Kyoto agreement.**

The U.S. claims it does not want to limit "developing" nations to certain technologies; that developing nations should decide for themselves which technologies are sustainable and which are not. However, implementation of the Kyoto agreement allows for very little equitable public participation, a situation many NGOs are currently working to remedy.

In fact, western nuclear companies, unable to get contracts at home due to safety, environmental and cost concerns, would be attempting to dump their unwanted and failing technology on developing countries. The U.S. has recognized that countries would be dealing directly with the energy company, not the U.S. government. Considering the track records of these companies in the U.S., Japan and Europe, there is every reason to suspect they will not be fair players in "developing" nations either, often sacrificing democratic principles, such as public participation, for profit. Additionally, many smaller developing nations fear nuclear power CDM credits would favor high-growth nuclear projects in developing countries over smaller, sustainable projects in non-nuclear developing nations.

Specifically excluding nuclear power from the CDM would not be neo-colonialism, in fact, it would be the opposite. As an Indonesia delegate commented: "I think it is simple colonialism to push nuclear power onto developing countries, leaving them with all the burdens that come with it". Citizens of many nations, including African, Indian, and Canadian NGOs, the Alliance of Small Island States (AOSIS) and twelve Latin American countries have publicly stated their opposition to CDM credits for nuclear power.

A 1999 Department of State document claims that "(t)he CDM should assist developing countries in achieving sustainable development..." further, it states "(t)he CDM should be a flexible, market-based mechanism that ensures cost-effective reductions..." Nuclear power is unsustainable and has been an economic boondoggle, meeting neither of these DOS criteria.

Nuclear power pollutes the environment with long-lived radionuclides from routine releases through normal operations and creates large quantities of radioactive waste. No country has yet been able to isolate these wastes from the environment by either man-made or natural barriers for even a fraction of their hazardous life. In the U.S. we have failed to find a way to safely store the first cup full of radioactive waste produced on April 24, 1942.

All nuclear power plants are vulnerable to serious accidents that could contaminate the environment and cause serious health impacts. Last year's accident at Tokaimura in Japan was just the latest to underline the dangers of nuclear technology. Previous accidents, including those at Chernobyl in Ukraine and Three Mile Island in the United States are still negatively impacting the health of countless individuals and their environment.

Nuclear power is a world security risk adding to the threat of nuclear proliferation. A 1000-megawatt reactor produces 40 bombs worth of plutonium per year. Handing a country a nuclear reactor is like handing it a nuclear bomb. The threat to global security posed by nuclear proliferation is equal to that of climate change. For the Kyoto Protocol to exacerbate this threat through its mechanisms would be a truly perverse and dangerous outcome to the Climate Convention negotiations and for your administration's own efforts to reduce nuclear proliferation.

The nuclear fuel chain does emit significant greenhouse gases. Should our use of nuclear energy increase, so will the amount of CO2 released at the front end of this energy source. As we mine more of the ore richest in uranium, we are left with uranium-poor ore. The extraction process then becomes more energy intensive to collect the same amount of concentrated uranium.

Nuclear power is the most expensive of all conventional energy sources and more expensive than almost all renewable energy. As proof of nuclear power's economic failure, no successful nuclear power reactor order has been placed in the U.S. since 1973. Ratepayers in the United States are bailing out nuclear reactors to the tune of \$300 billion dollars. Nuclear energy costs an average of 12 cents/kWh compared with 7.6-9.1 cents/kWh for solar thermal and 4-6 cents/kWh for wind. Because nuclear power actually reduces less greenhouse gas, dollar for dollar, than energy efficiency, investing in nuclear power will hurt our attempts to address climate change. Sadly, there is no officially recognized mechanism to credit for energy efficiency investment.

Including nuclear power in the CDM could seriously jeopardize climate talks and ultimately derail Kyoto. At the very least, the U.S. position would support exporting nuclear power and its dangers (including nuclear waste, huge economic costs, nuclear weapons material, chronic radioactive releases, and abuse of democratic principles) all over the world. This is a legacy the Clinton/Gore administration would not wish to leave. Instead of giving credit to nuclear power, we must invest in energy efficiency and sustainable energy, which give more greenhouse gas

reduction per dollar. We should learn from our mistakes, not export them to others. In order to make the CDM what the Department of State claims it should be, the U.S. must support excluding nuclear power from the CDM.

Sincerely,

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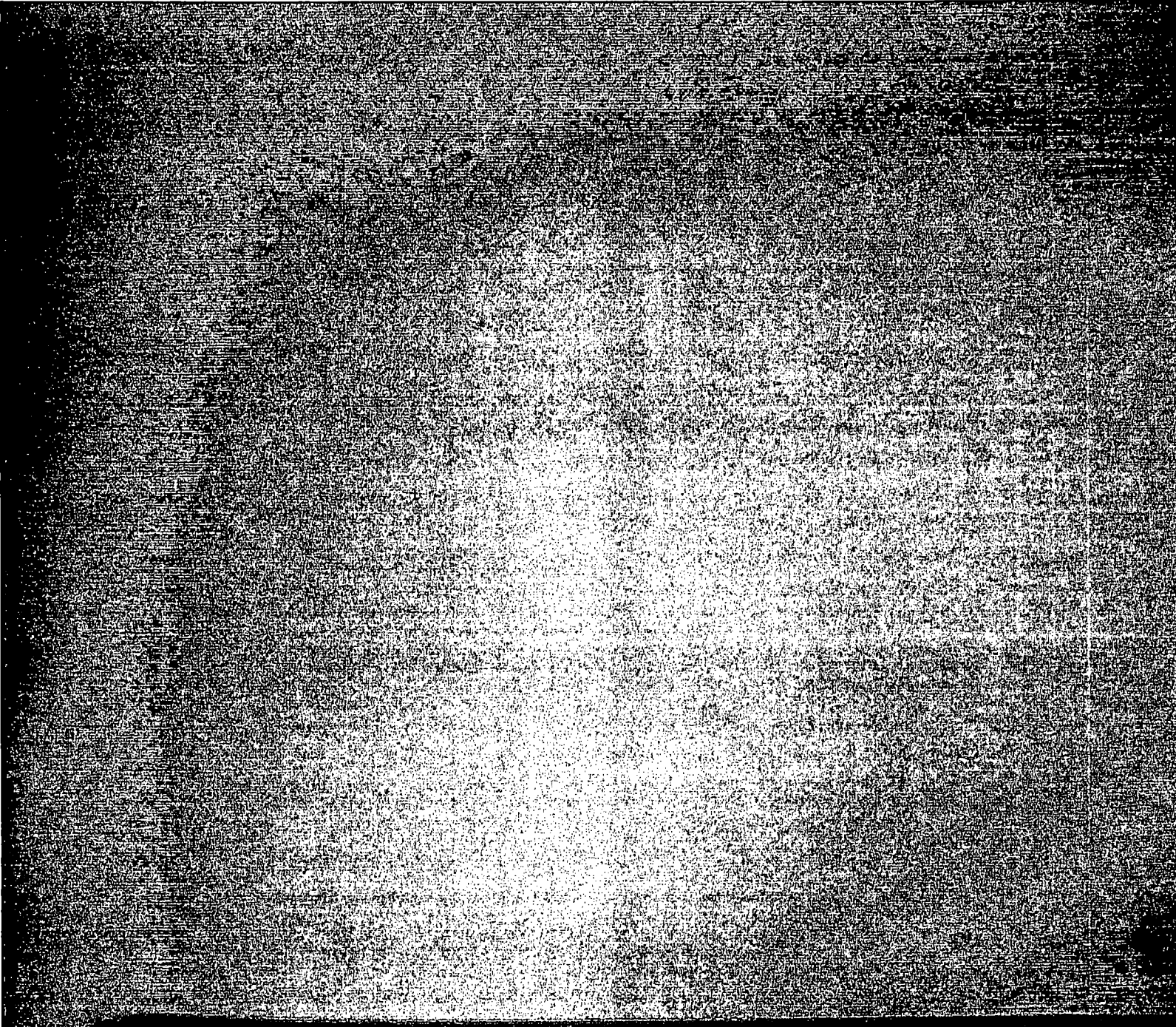
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new climate
file -- nuclear



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NUCLEAR ENERGY INSTITUTE

PCAST Report Recommendations and Nuclear Funding Opportunities

- As the Administration finalizes its FY 2001 budget, NEI requests your consideration of increased funding for nuclear R&D initiatives recommended by the President's Committee of Advisors on Science and Technology (PCAST) that have not received adequate funding to date.
- PCAST acknowledged the importance of nuclear energy in avoiding carbon emissions and suggests that it would be important for the Administration to recognize "nuclear energy as an energy option that could contribute substantially to meeting national and international goals, if the concerns surrounding it are resolved."
- PCAST also recognizes the importance of international markets and international cooperation for maintaining a viable U.S. commercial nuclear capability, stating, "the Administration's export policy should support the nuclear industry in the same fashion it supports other U.S. industries."
- In this year's PCAST report on international cooperation the Committee states that one of the 'high-priority nuclear' projects is to preserve and enhance the possibility that nuclear power could play an expanding role in addressing climate change and other energy-related challenges in the next century.
- The first action the report recommends is an explicit international component to the DOE's new Nuclear Energy Research Initiative (NERI) promoting bilateral and multilateral research focused on advanced technologies for improving the cost, safety, waste management, and proliferation resistance of nuclear fission energy systems. We urge the administration to support a new \$30 million international nuclear cooperation program in the DOE Office of Nuclear Energy for FY 2001.
- PCAST also noted the importance of world leadership in nuclear technologies and the erosion of this leadership in the U.S. One contributing factor is no new plants are being built in the U.S. According to the report, "this situation depresses R&D investments, slows progress and innovation, and affects the career choices of bright young people, who choose other specialties, thereby impoverishing U.S. human resources in nuclear fields."



- To begin to change this situation, we recommend a \$25 million DOE University Nuclear Engineering and Science program that will support 29 universities with reactors, historic black colleges with nuclear technologies programs, and student scholarships.
- The chart below summarizes the PCAST recommendations, current funding levels, and NEI recommendations for the various programs.

Program	PCAST Recommendations	DOE Budget Request	Congressional Funding	NEI Recommendations
NERI (R&D)	\$70 M (FY00)	\$24 M (FY00)	\$22.5 M (FY00)	\$50 M (FY01)
NEPO	\$10 M (FY00)	\$5 M (FY00)	\$5 M (FY00)	\$10 M (FY01)
International NERI	\$30 M (FY01)	N/A	N/A	\$30 M (FY01)
DOE University Nuclear Engineering & Science Program	N/A	\$11 M (FY00)	\$12 M (FY00)	\$25 M (FY01)



NUCLEAR ENERGY INSTITUTE

Angelina S. Howard

SENIOR VICE PRESIDENT
INDUSTRY COMMUNICATIONS

Via Fax and Mail

October 28, 1999

The Honorable Frank E. Loy
Under Secretary for Global Affairs
U.S. Department of State
2201 C Street, NW
Washington, DC 20520

Dear Mr. Loy:

Recently, you very graciously allowed several of us from the Nuclear Energy Institute to meet with you to discuss the contribution of emission-free nuclear energy to carbon abatement policies. During our meeting, we discussed the U.S. preference that in the event the Kyoto Protocol is adopted, the implementation framework developed by parties to the Climate Change Convention should not interfere with the sovereign right of all countries to decide how to obtain carbon reductions, including use of the Kyoto Mechanisms.

The Nuclear Energy Institute has reviewed the most recent Chairmen's note synthesizing proposals by the parties on principles, modalities, rules and guidelines on *Mechanisms Pursuant to Articles 6, 12 and 17 the Kyoto Protocol* (FCCC/SB/1999/8; 8 September 1999). I would like to invite your attention to Item 79(g) under Section II-Methodological and Operational Issues (p.27). This language, included by the Alliance of Small Island States (AOSIS), is designed to exclude nuclear energy projects from consideration as activities under the Clean Development Mechanism (CDM).

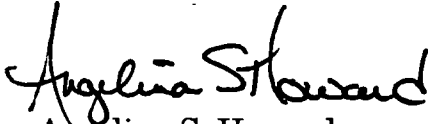
As the negotiations on the Kyoto Mechanisms continue, NEI urges the United States to take the position that this provision is not appropriate for future versions of the Chairmen's note. In our country and around the world, nuclear energy has provided energy security, economic growth, and protected environmental quality. Although some nations may individually choose to obtain electricity from sources other than nuclear energy, such choices cannot validly be imposed on other parties

Frank Loy
October 28, 1999
Page 2

to the Convention. In fact, protecting the sovereign right of every nation to make individual choices about its own sustainable development is a critical principle in the United Nations' Agenda 21. For these principles to remain valid and credible, they cannot be selectively applied or ignored for political expedience, particularly in other U.N.-led international efforts to protect the environment.

NEI staff will be participating in COP 5 and will take all appropriate steps to better inform AOSIS member countries of the beneficial role nuclear technologies can play in adapting to and mitigating the effects of climate change. We also look forward to the opportunity to work with you and your staff to ensure that this discriminatory text is not included in future versions of the negotiating instrument.

Sincerely,


Angelina S. Howard

c: Senator Robert Byrd
Senator Chuck Hagel
Senator Frank Murkowski
Senator Jeff Bingaman
Rep. Jim Sensenbrenner, Jr.
Rep. Ralph Hall



NUCLEAR ENERGY INSTITUTE

Angelina S. Howard
SENIOR VICE PRESIDENT,
INDUSTRY COMMUNICATIONS

February 8, 1999

The Honorable Frank E. Loy
Under Secretary for Global Affairs
U.S. Department of State
2201 C Street, NW
Washington, DC 20520

Dear Mr. Loy:

On behalf of the nuclear energy industry, NEI wishes to submit the enclosed comments for consideration in the workshop to be held February 11, 1999, to elaborate the U.S. views on negotiations concerning the Kyoto Mechanisms.

Nuclear energy has successfully avoided the emission of millions of tons of greenhouse gases into the atmosphere since the beginning of its commercial use four decades ago. At the same time, this vital energy source has produced billions of kilowatts of electricity for hospitals, schools, and homes using appropriate waste management practices to avoid or mitigate other potential adverse impacts to all environmental media. Measures taken by the government of the United States to address man-made emissions of greenhouse gases should include maximizing the use of nuclear power and other greenhouse gas-avoiding technologies in the global energy portfolio.

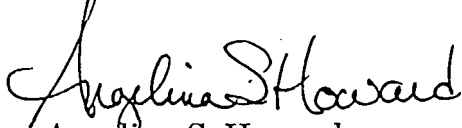
As the United States continues its carbon abatement efforts under the United Nations Framework Convention on Climate Change, nuclear energy production must:

- Be recognized as a necessary contributor to reaching voluntary domestic greenhouse gas reduction goals;
- Become a primary vehicle for generating emission credits through unrestricted and non-discriminatory credit creation and trading programs;
- Be part of an enhanced international trade program to achieve greenhouse gas avoidances in other countries through the sale and use of nuclear and greenhouse gas-avoiding technologies; and
- Be regulated in a manner consistent with maintaining nuclear power as a necessary resource to achieve domestic greenhouse gas goals through the next century.

Frank E. Loy
February 8, 1999
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Again, NEI appreciates this opportunity to provide comments for this workshop. Should the Department of State or other participants have any questions or require additional information, please contact me or Maureen Koetz, Director of Environmental Policy, at 202-739-8013.

Sincerely,


Angelina S. Howard
Senior Vice President

c:

Dan Reicher
William Magwood
Dirk Forrester
Melinda Kimble
Ambassador Mark Hambly
Daniel Reifsnyder
Marshall Adare
Tom Kuhn, EEI
William O'Keefe, API
Connie Holmes, NMA

NEI COMMENTS TO THE DEPARTMENT OF STATE
on
POLICIES TO MAINTAIN THE CONTRIBUTION OF NUCLEAR
ENERGY TO CARBON ABATEMENT
and
PROPOSALS FOR POSSIBLE IMPLEMENTATION
OF THE KYOTO MECHANISMS

Submitted February 8, 1999

Introduction

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)¹ appreciates this opportunity to submit comments for consideration in the workshop to be held February 11, 1999, to further develop U.S. views in negotiations concerning the Kyoto Protocol to the United Nations Framework Convention on Climate Change (UNFCCC). The first section provides NEI's overall policy recommendations to ensure the continued contribution of nuclear energy to achieving carbon abatement. The second section comments more specifically on nuclear issues related to the elaboration of the Kyoto Mechanisms in the event of ratification and implementation of the Kyoto Protocol to the UNFCCC.

I. Nuclear Energy and Greenhouse Gas Abatement

Growing concerns about global climate change have led countries around the world to join in an effort to abate the emission of carbon and other gases thought to be adversely enhancing the earth's natural greenhouse effect. At the same time, countries face enormous challenges to develop sufficient energy and other resources to ensure a safe, healthy population and environment. Around the world, nuclear energy is, and will

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear materials licensees, and other organizations and individuals involved in the nuclear energy industry.

continue to be, the primary large-scale source of electricity produced without emitting greenhouse gases.²

Greenhouse gas emissions are generally viewed in terms of sources that emit them or sinks that reduce them. But a third category comprising existing emission *avoidance* technologies must be recognized for its contribution to ongoing carbon abatement. Currently, the 429³ nuclear power plants worldwide generate over 17 percent of the world's electricity while avoiding emissions of more than 500 million metric tons of carbon equivalent (MMTCE).⁴ Annually, America's 103 operating nuclear plants avoid the release of over 150 million metric tons of carbon,⁵ more than double the 70 million metric ton carbon reduction called for in President Clinton's 1993 Global Climate Action plan. At the same time, these plants provide almost twenty percent of the electricity in the United States, primarily to densely populated urban and suburban areas of the country with demand for large-scale, baseload electricity to serve schools, hospitals, public transportation systems, industry, banking, and residences, and to maintain food supply.

The contribution of nuclear energy to U.S. carbon abatement efforts is irrefutable. Today, in order to achieve its original commitment under the UNFCCC⁶ the United States would be required to reduce its emissions by 158 MMTCE.⁷ Reducing current emissions to the Kyoto target levels would

² Several organizations opposed to nuclear energy have taken the position in the climate change debate that the environmental impacts from nuclear electricity generation must be measured over its entire lifecycle, demonstrating that small amounts of greenhouse gases are emitted during the enrichment portion of the fuel production cycle. Studies by the International Atomic Energy Agency using lifecycle analysis show that nuclear energy has lower emissions of greenhouse gases than any other conventional or renewable source. Effective waste minimization and management practices also prevent adverse impacts to the environment from other fuel-cycle byproducts such as used fuel. Unfortunately, lifecycle analysis is not used uniformly to examine the total adverse impacts from other sources of generation, nor are adverse impacts properly indexed against the amount of electricity produced. For clarity and consistency, NEI will continue to use the term "emission-free" to refer to electricity generated at a nuclear facility, but supports any actions to encourage or ensure all forms of electric generation adopt a full lifecycle analysis as the basis for depicting their impacts across all environmental media.

³ Uranium Institute Industry Statistics, revised December 17, 1998; www.uilondon.org.

⁴ The calculations and measurements related to carbon emissions presented in these comments will use million metric tons of carbon equivalent or MMTCE, the standard used in DOE analyses and the baseline calculations under the UNFCCC.

⁵ This number is calculated using a proportional increase in existing percentages of carbon-based fuels that would occur in the absence of nuclear generation nationwide.

⁶ The Rio Treaty called for the United States to voluntarily reduce its carbon emissions to 1990 levels by 2000.

⁷ 1997 levels (1,791 MMTCE) minus the 1990 baseline (1,633 MMTCE).

require reductions totaling 272 MMTCE.⁸ Without the emission avoidances from nuclear energy cited above, the emission reductions required by the Kyoto Protocol would increase by more than 50 percent.

The crucial role played by nuclear electricity in carbon abatement is not lost on our allies and competitors in the global marketplace. The ambitious target and timetable for emission reductions originally sought by the European Union was backed up by strong nuclear power generation capacity in most of these countries. For example, France obtains about 80 percent of its electricity from nuclear energy, Belgium about 60 percent; the United Kingdom has gone from 19 percent nuclear electricity in the UNFCCC baseline year of 1990, to current levels in excess of 30 percent. Japan, which also advocated emission reduction targets below those of the original UNFCCC goal of 1990 levels, currently gets 30 percent of its electricity from nuclear energy, and has announced plans to construct perhaps as many as twenty new nuclear plants by 2010 to meet its target. In spite of its new government's recently stated intent to phase out nuclear electricity, Germany continues to rely on this source of generation for over 30 percent of its electricity. As in the United States, most of this emission-free generation was operating at the time the 1990 baselines were established. The European Union (EU) has committed to a reduction target of 8 percent below the 1990 baselines for its members. It remains unclear how the EU will comply with the targets in the Kyoto Protocol if unanticipated carbon-based fuel use creates electricity-related emissions originally scored at zero when the baselines were calculated because the generation source was non-emitting.

Currently, nuclear plants are competitively selling electricity in both U.S. and world markets at prices that include the internalized costs of preventing or mitigating adverse impacts to the environment. For example, the price of nuclear electricity includes the costs of waste management and plant decommissioning. As global development moves toward ensuring sustainability, successful internalization of external costs will become an important benchmark in energy choices, one that nuclear energy already satisfies.

In addition, actions taken to abate carbon emissions through continued and expanded use of nuclear energy also assist in achieving the goals of reducing emissions of controlled pollutants under the Clean Air Act. The cumulative contribution to U.S. clean air compliance since the 1973 oil embargo is enormous. Between 1973 and 1996, U.S. nuclear power plants

⁸ In the Kyoto Protocol, the United States agreed to reduce its emissions to 7 percent below the 1990 baseline, or to 1,519 MMTCE.

prevented the emission of about two billion metric tons of carbon, 80 million tons of SO₂ and over 34 million tons of NO_x.

For many reasons, current and future nuclear energy projects are a superior method of generating emission credits that must be considered as the U.S. expands the use of market-based mechanisms designed around emission credit creation and trading to achieve environmental goals. First, because operation of the plants produces no greenhouse gas emissions, expensive additional equipment to monitor, measure, and report avoidances or reductions is not required. Once an agreed-upon level is established as to the emissions that would have occurred using alternative electricity sources, the nuclear project's credits are equal to the total avoided emissions based on the electricity produced above an established baseline. For a new plant or a voluntary license extension, the baseline would be zero. For an uprate, capacity factor increase, or a modernization project, the baseline would be the generation level at the time the action is taken.

Second, the scale of nuclear projects can provide a significant number of credits, attracting more and larger capital investment.

Third, credits from a nuclear project could be shared among many participants, expanding the categories of industrial entities that can access and benefit from the credit incentive. For example, in a new construction project, builders (including reactor vendors, cement manufacturers, and construction firms) and the electric utility could agree up front on an apportionment of credits as part of the project's contracts.

Finally, the expanded use of electricity as a primary or secondary energy source is, in and of itself, a method of abating greenhouse gas emissions; creating credits from a greenhouse gas-free electricity source essentially provides a double benefit to the environment.

The continued economic growth required by the developing world will create attendant increases in all forms of industrial waste byproducts and emissions. To the extent the developing countries may be in a position to create carbon abatement programs, or accept commitments under the Kyoto Protocol, these efforts will largely be based on strategies to avoid future growth in carbon emissions, rather than obtaining reductions from current emissions levels. Thus, use of nuclear energy to avoid carbon emissions in countries operating subject to international safeguards is an important potential tool for any future meaningful participation of developing countries in global efforts to manage potential carbon risk. As this participation is a political concern in Senate ratification of the Kyoto Protocol, safeguarded nuclear projects should be identified as possible compliance mechanisms when encouraging developing country acceptance of an abatement target.

Given the important goal of reducing greenhouse gas emissions and the key role already played by nuclear energy in managing carbon risk through avoidances, any plausible strategy to mitigate greenhouse gas emissions will require the continued contribution of this crucial energy source in the United States and around the world. Therefore, NEI submits that U.S. policy on climate change should be based on the following precepts:

- *Current greenhouse gas avoidance from the operation of nuclear energy facilities and other non-emitting electricity generation sources is an integral part of the current and future U.S. carbon abatement strategy.*
- *All avoidance technologies should participate on an equal footing with reduction activities in any U.S. greenhouse gas abatement program, including mechanisms for emission credit earning and trading.*
- *Emission allowances used in trading programs should be distributed in a manner that does not discriminate against avoidance technologies.*
- *Trade, regulatory, and solid waste management policies must be consistent with maintaining all emission-free technologies in the domestic and global energy portfolio.*

II. Kyoto Mechanisms

1. Emissions Trading

At the time the UNFCCC became the law of the land, nuclear facilities were producing significant levels of electricity without adding any tons to the U.S. 1990 baseline for greenhouse gas emissions. Although not widely discussed at the time of the treaty's signing and ratification, this avoidance capacity was already abating the overall carbon emission levels of the United States and is entitled to credits in the same manner, and to the same extent, as actions taken to reduce greenhouse gases such as sinks, sequestration, or other reduction technologies in the event binding emission limitations are established.

Avoidance actions eligible for credit creation and trading should include (but are not limited to):

- Any tons avoided through an increase in generation levels and output over the 1990 baseline year

- Any tons avoided by renewal of an existing license beyond the currently scheduled date of expiration
- Any tons avoided through the addition of a new nuclear power unit at a new or existing station

Including avoidance technologies in credit creation and trading is consistent with the treatment afforded voluntary actions taken to date by the electric utility sector in the Department of Energy's *Climate Challenge* program as part of the Clinton Administration's *Climate Change Action Plan*. In that program, abatement actions pledged at nuclear energy facilities have been reported under Section 1605(b) of the Energy Policy Act of 1992, and are avoiding an additional 15.7 MMTCE—the largest component of the program. If utilities choose to relicense all the plants with expiration dates before 2020, almost 70 MMTCE will be avoided. Moreover, domestic plant enhancement projects, license renewal, or new construction of nuclear generating stations provide a means to create domestic credits that are not subject to disqualification based on any application of the concept of supplementarity in Article 6 of the Kyoto Protocol.

As noted above, any initial distribution of emission allowances for use in a trading program in the domestic electricity sector should be based on generation capacity to ensure that such a system does not discriminate against all current and future avoidance technologies, such as wind, solar, nuclear energy, and hydroelectric power.

2. Joint Implementation

Developed countries have become increasingly reliant on nuclear energy as they balance economic expansion, enhanced energy availability and security, and environmental protection to ensure sustainable development. The need to both maintain existing reactors in a safe, productive status, and expand electricity supply in the face of limitations on fossil fuel use create positive circumstances for developed countries to conduct safeguarded nuclear energy joint implementation projects that abate carbon and create tradable credits. Qualified nuclear joint implementation projects should include:

- Upgrades or modernization projects that increase electric capacity
- Refurbishments that improve operational safety or extend the life of a plant beyond current expectancy
- New plant construction

The United States not only operates the largest, most successful nuclear program in the world, it also has taken a leadership role in

developing advanced nuclear technology. The three standardized advanced light water reactors that have been reviewed and approved by the Nuclear Regulatory Commission incorporate the best, proven reactor technology in the world. The use of this U.S. technology worldwide will enhance safety and reliability in those countries using the technology, while also providing economic benefits and important infrastructure support benefits to existing plants in the United States. Also, when new U.S. nuclear generating capacity is required, the experience gained from the construction and operation of American advanced technology overseas will provide safety, efficiency and economic benefits during the construction and operation of the plants in the United States.

America's technological leadership in the field of peaceful nuclear applications has played an important role in achieving broader foreign and national security policy, and can continue to do so in the area of climate change policy. Nuclear technology is one of the tools that the federal government uses to shape the international environment in ways favorable to U.S. interests and global security. American leadership in nuclear technology enhances foreign policy goals in several crucial ways, including:

- enabling the U.S. government to influence other nations' nonproliferation policies and, thereby, advancing national security goals (e.g., surplus weapons plutonium disposition)
- enhancing nuclear safety worldwide by incorporating the most advanced nuclear technology and infrastructure into countries with developing industrial sectors
- providing opportunities for international trade and creating U.S. jobs.

Many Annex I countries in central and eastern Europe rely on their nuclear plants for electricity supply, yet need modernization and safety upgrades for future operations. A lack of financial resources and inability to access international capital and investment has been one of the major obstacles to these refurbishments. Additionally, nuclear plants are under construction or planned in Annex I countries all over the world—Republic of Korea, Japan, and Czech Republic to name a few. The market for new nuclear plants in Annex I countries in Asia, Europe, and the Newly Independent States is still growing. Identifying these projects for joint implementation and greenhouse gas credit creation can provide additional financial incentive to spur these much needed electricity supply, upgrade, and safety projects.

3. Clean Development Mechanism (CDM)

World population is expected to reach 10 billion in about 50 years. Even with major gains in conservation and efficiency programs, world energy supply must double, or maybe triple, over the next 50 years, and newly industrializing nations, as they struggle to advance, will increase their use of energy far more rapidly than the industrialized economies. For all countries, but especially those in the developing world, improved quality of life, access to drinkable water, freedom from disease, and the prevention of hunger are all inextricably linked to energy supply. For example, between one-quarter and one-third of the world's entire food harvest is spoiled, largely due to lack of refrigeration.

Renewable energy resources will not be able to sustain these growing energy needs; there is no question that fossil fuels will be a major energy source used by the developing countries. China already burns over a billion tons of coal a year, but is also considering expansion of nuclear energy programs as an alternative to more growth in fossil fuel use. As in the developed world, appropriate use of safeguarded nuclear energy in the fuel mix allows developing countries like China to balance the needs for economic expansion, energy availability and security, and environmental protection to ensure sustainable development. Maintaining existing reactors in a safe, productive status, and increasing electricity supply without further expanding fossil fuel use require the Clean Development Mechanism (CDM) rules and procedures to include nuclear energy projects in the developing world, should the Kyoto Protocol come into force.

As with Joint Implementation, categories of projects eligible for the CDM should include:

- Upgrades or modernization projects that increase electric capacity
- Refurbishments that improve operational safety or extend the life of a plant beyond current licensed authorization
- New plant construction

Accreditation under CDM guidelines should not impose limits on the nature or scope of projects in a manner that could interfere with the valid decisions of an individual country as to its energy policy. Rather, implementation of the CDM should be inclusive, varied, and adaptable to all energy and environmental needs of an individual nation.

In addition, projects initiated after 1990 that will achieve emissions avoidances in the 2000-2012 time period should be included for accreditation. For example, China is building two reactors at Qinshan in eastern China that will help that nation avoid emissions of approximately 2.4 million metric tons of carbon per year. There is also an extensive technology transfer and

training program associated with the project. Plans in China to construct additional nuclear plants to maintain energy supply for its economic growth, if eligible to create tradable credits under the CDM, could provide a significant incentive for acceptance of voluntary commitments by a country that will be a major source of greenhouse gas emissions into the next century.

As with Joint Implementation projects, the significant volume of emissions avoidances created by nuclear energy projects means multiple entities in the production chain may be able to share in apportioned credits related to CDM projects. Four of the ten most productive uranium mines in the world are in Africa, and several countries on that continent have undeveloped reserves of uranium. In addition, because the capital costs and level of investment in nuclear energy projects is substantial, nuclear CDM projects will create more funding for adaptation activities by parties vulnerable to the potential effects of climate change. Using emission-free nuclear energy in place of fossil fuels will always create additional credits, and require new investment, satisfying the so called "additionality" requirement in Article 12 of the Kyoto Protocol.⁹

Finally, we respectfully suggest that any rules and guidelines for implementing the CDM be as simple and flexible as possible to minimize transaction costs and speed project review and approval.

III. Conclusion

Nuclear energy has successfully avoided the emission of millions of tons of carbon into the atmosphere since the beginning of its commercial use four decades ago. Measures taken by the government of the United States to address man-made emissions of greenhouse gasses should include maximizing the use of nuclear power and other greenhouse gas-avoiding technologies in the global energy portfolio.

As the United States continues its carbon abatement efforts under the United Nations Framework Convention on Climate Change, nuclear energy production must:

- Be recognized as a necessary contributor to reaching voluntary domestic greenhouse gas reduction goals;

⁹ Care should be taken in the interpretation of the concept of "additionality" in relation to the development of electricity projects. Because electricity demand is always growing, electricity facilities will always be "planned," especially in the developing world. A too stringent interpretation could penalize countries for exercising good foresight and planning, obviously a counter-intuitive notion to the overall goals of the CDM itself.

- Become a primary vehicle for generating emission credits through unrestricted and non-discriminatory credit creation and trading programs;
- Be part of an enhanced international trade program to achieve greenhouse gas avoidances in other countries through the sale and use of nuclear and greenhouse gas-avoiding technologies; and
- Be regulated in a manner consistent with maintaining nuclear power as a necessary resource to achieve domestic greenhouse gas goals through the next century.

Again, NEI appreciates this opportunity to provide comments for this workshop. Should the Department of State or other participants have any questions or require additional information, please contact Maureen Koetz, Director of Environmental Policy, at 202-739-8013.

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Meeting Our Clean Air Needs With Emission-Free Generation

The Need for Nuclear Energy



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