

On July 31, 1999 Nuclear Energy Research Advisory Committee (NERAC) adopted the accompanying resolution regarding the Fast Flux Test Facility (FFTF), recommending that the Department of Energy take the steps to proceed toward a Record of Decision on the facility, including in this decision process consideration the role that this research facility could play in a comprehensive national nuclear energy research program before reaching a final decision to startup or decommission the facility. This letter of transmittal is intended to provide a background for this meeting.

During our July meeting, the Committee considered carefully the Program Scoping Plan developed and presented by the Pacific Northwest National Laboratory, while commending William Madia and his colleagues for an admirable job in preparing this plan under significant time constraints. In our discussions, it was clear that a significant majority of NERAC believes it would be a mistake to decommission FFTF at this point, because of its unique characteristics for nuclear energy research and the difficulty in reproducing the features of this facility at a future date. Yet it was also clear that many members of NERAC did not believe that the case presented by Program Scoping Plan for isotope production and generation of revenues from non-DOE sponsored users was sufficiently compelling to justify restart. (Several of the concerns of various members of NERAC about these later considerations are provided in the resolution accompanying this letter.)

NERAC believes that FFTF was designed primarily as a research facility and, as such, could play an important role in supporting a comprehensive national research effort in sustaining the nuclear energy option for the 21<sup>st</sup> Century. It provides a unique and important complement to other DOE facilities. Yet, in the absence of a long-range DOE plan for nuclear energy research, it is difficult to support a commitment to restarting the facility based upon FFTF's role primarily as an isotope production reactor or user irradiation facility.

For this reason, NERAC drafted a compromise resolution, supported by all but two of its members, that recommends that the Department begin the process of moving toward a Record of Decision, including the EIS, funding requirements, and other relevant considerations, *but to launch simultaneously a concerted effort to develop a long-range plan for nuclear energy research.* This plan, which was addressed in part by a second resolution of NERAC (also enclosed), would consist of programmatic elements (including both merit-driven, peer-reviewed extramural research programs such as NERI and mission-driven intramural efforts in DOE laboratories), investments in human resource development (education and training), and the needs for research infrastructure (e.g., HFIR, ATR, and FFTF). We believe that if sufficient resources were committed, the necessary expert panels could be assembled and this plan could be developed within 12 months, on a timely basis to provide input to the FFTF Record of Decision process. If this plan justifies FFTF as a desirable component of the nation's nuclear energy research infrastructure and other considerations such as EIS and funding are positive, then restart could be approved. If the research plan does not support the restart of FFTF, then the ROD could begin the decommissioning process.

In summary, it is the strong sense of NERAC that FFTF has the potential of being an important component of the infrastructure to support the nation's nuclear energy research programs for the 21<sup>st</sup> Century. But the final decision on whether to restart or decommission the facility must be made within the framework provided by a long range R&D plan designed to preserve the nuclear energy option for our nation. The Nuclear Energy Research Advisory Committee stands ready to assist DOE in both the development of this plan and evaluating its implications for DOE facilities such as FFTF.