



September 13, 2018

Mr. Michael Vaccaro

Acting Director

Office of Technology Evaluation

Bureau of Industry and Security

U.S. Department of Commerce

1401 Constitution Avenue, NW

Room 1093

Washington, DC 20230

RE: Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Uranium, DOCKET BIS-2018-0011

Dear Mr. Vaccaro,

The Texas Mining and Reclamation Association (“TMRA”) is a non-profit statewide trade organization comprised of over 150 members including producers of coal, industrial minerals and uranium as well as electricity generation utilities, support service industries and individual members. We appreciate the opportunity to offer comments on this very important matter of national security and safety.

As America’s domestic uranium industry erodes, so does US national and energy security. It is totally unacceptable that as the world’s largest consumer of uranium, in 2017 the United States produced only 5% of the uranium needed to supply 20 percent of our nation’s electricity. As recently as 1987, US production supplied 49 percent of our national nuclear fuel requirements used to produce the carbon-free base load electricity from nuclear power.

This decline in supplying our own domestic needs is not due to a lack of uranium resources. In fact, the US are home to abundant uranium resources capable of supplying both our defense and commercial needs for decades. Yet over the past decade, this key strategic industry has constricted to the point that US national security is now threatened due to the lack of reliance on domestic sourced uranium.

Uranium is also critical for our defense needs and must be supplied from domestic production sources. The language and goals of several international treaties mandate the use of domestic uranium for national defense purposes. Specifically, US nuclear warheads are required by law and treaty to be manufactured from domestically produced uranium. Similarly, uranium that is processed into fuel for the nuclear Navy must be of US origin. Although the Department of Energy maintains a supply of uranium to meet our defense needs, that supply is not unlimited and additional US origin uranium will eventually be required and there is very real concern that when this need arises, our domestic mines will be unable to meet supply demands in a timely manner with no alternative for supply. This is a clear issue of national security.

In summary, with 20% of the US base load energy production provided by uranium along with defense requirements mandating the use of domestic uranium, TMRA believes that the Section 232 petition demonstrates that an investigation is not only warranted, but necessary and in the interest of the national defense.

Thank you for your consideration and the opportunity to provide our views on this vital issue.

Regards,

A handwritten signature in blue ink that reads "Chesley Blevins". The signature is written in a cursive, flowing style.

Chesley Blevins, Executive Director

Texas Mining and reclamation Association

cc: Nellie Frisbee, TMRA Chairman

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