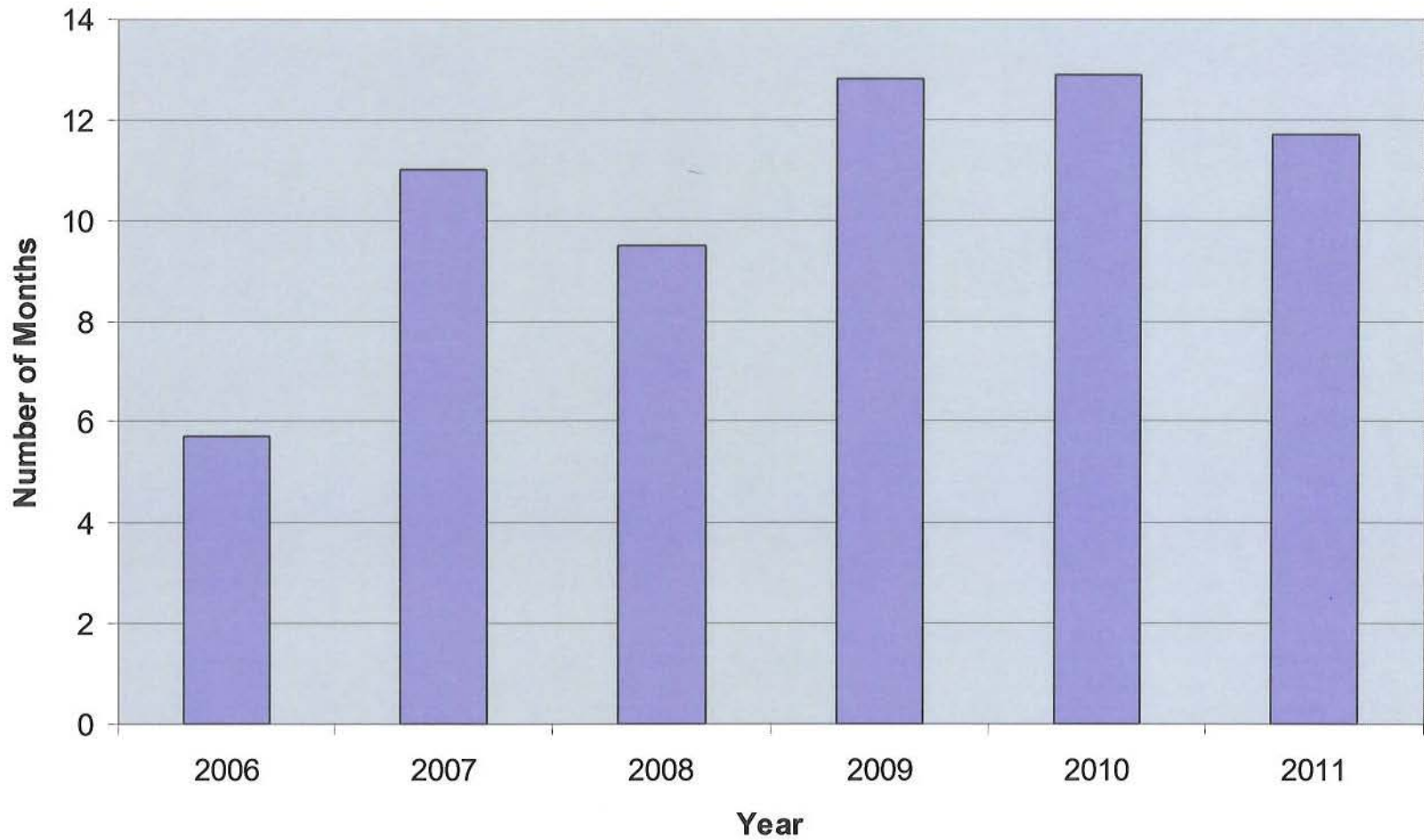


Average Time for Processing Part 810 Specific Authorizations



The periods in this chart were calculated based on information in publicly available specific authorizations granted by the Secretary of Energy, as well as non-public information maintained by Pillsbury. The specific authorizations considered did not include specific authorizations granted for deemed exports.



Selected Economic Impacts of 10 CFR 810 Proposed Rule

Specific elements in the proposed rule would have immediate effects:

Company A, which provides skilled supplemental personnel for nuclear plants, reported that the modification of the specifically authorized country list (10 CFR 810.8a) would prevent it from utilizing a significant portion of its foreign national workforce for outage work in the U.S. These workers protect the health and safety of workers at nuclear plants. This has a projected economic impact on Company A of over \$3 million per year.

Company B, whose technology is newly included in the expanded scope of the proposed regulation, reported that the processing time for specific authorizations will effectively preclude it from bidding on a significant portion of international tenders. The typical response period for tenders in this sub-sector is one to two months, and contracts are typically in place within four months. With the expansion in scope and the increase in the number of countries requiring specific authorization, Company B estimates a loss of approximately \$75 million per year in revenue.

Company C, whose technology is newly included in the expanded scope of the proposed regulation, reported that the processing time for specific authorizations will preclude it from bidding on a significant portion of international tenders or make their bids non-competitive because of perceived risks in receiving approvals after contract award. The typical response period for tenders in this sub-sector is two to three months. In addition, the 5-year period for specific authorization would create the perception among foreign customers of increased risk in long-term contracts with U.S. suppliers. This risk would result in reduced U.S. competitiveness. Company C also expects to incur additional legal and regulatory costs which would negatively impact its competitiveness and profitability. With the expansion in scope, the increase in the number of countries requiring specific authorization, and the limited duration of a specific authorization, Company C estimates \$15 million per year in lost revenues and \$2 million per year in lost profit.

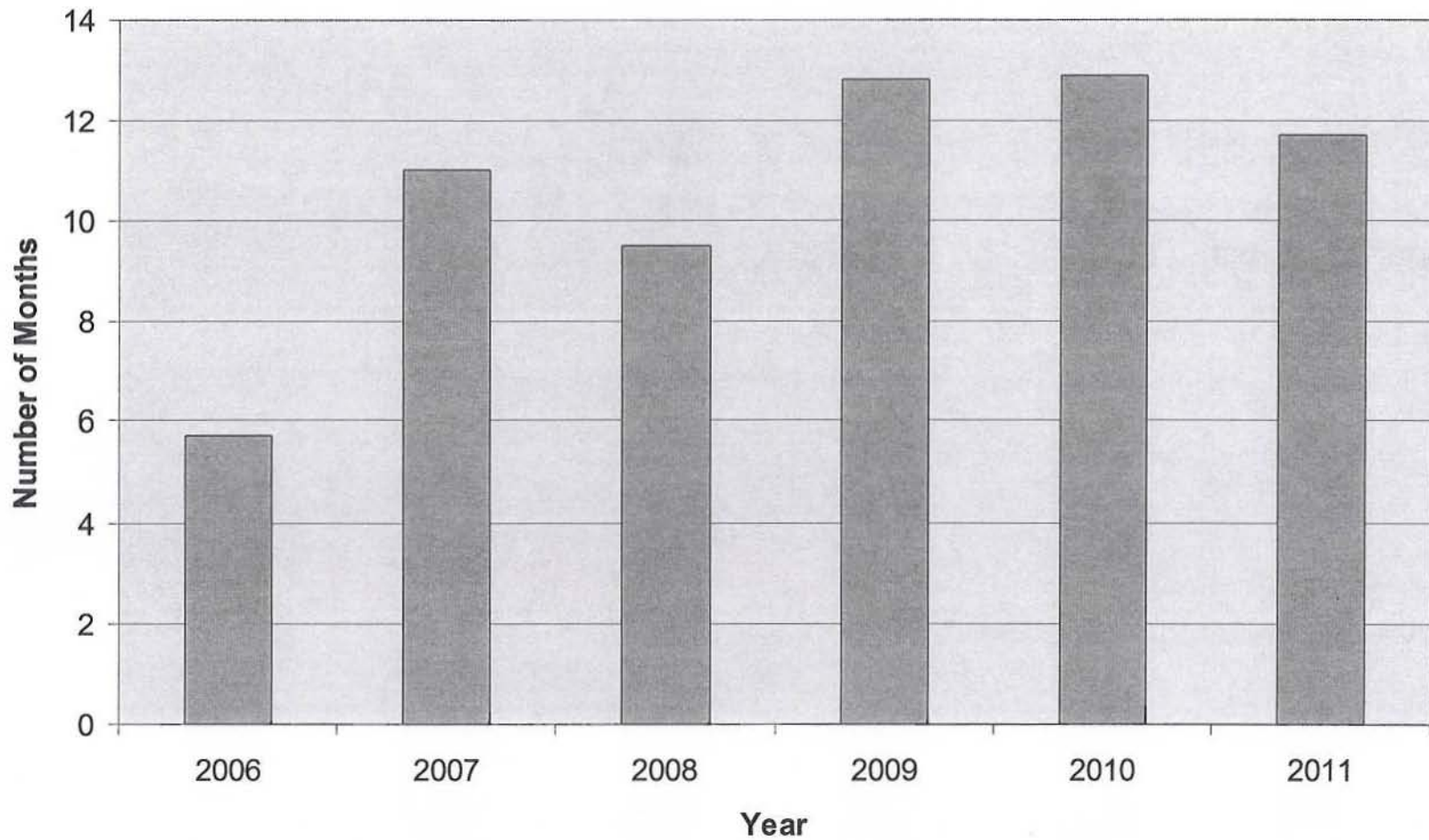
Lack of clarity in the rule (current and proposed) impairs U.S. competitiveness:

Company D, which provides consulting and engineering services, reported that a customer in the Middle East questioned whether it would be required to have a specific authorization under 10 CFR 810 to engage in assisting with the establishment and operation of the nation's nuclear regulatory infrastructure. This is a critical issue, since reliability as a trading partner is often a key criterion for bid assessment. The total contract value for this work is estimated at between \$70 and \$90 million. Company D also reported that it has received similar questions from other foreign customers who are evaluating suppliers.

Slow processing negatively impacts U.S. competitiveness:

Company E reported that delays in obtaining assurances for the design and engineering of a major nuclear component for a Chinese customer resulted in the customer selecting a Canadian supplier to provide the conceptual design for the project. While the conceptual design portion of the \$25-million project scope is \$2-3 million, this initial award is significant because it puts Company E at a significant disadvantage for any follow-on work.

Average Time for Processing Part 810 Specific Authorizations



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NUCLEAR ENERGY INSTITUTE

**Impact of Proposed Revision to 10 CFR Part 810
on Country Eligibility for General Authorization**

Would Become Ineligible: 73 countries

Countries eligible for general authorization under the current rule that would become ineligible for general authorization under the proposed rule:

Antigua and Barbuda	Holy See	Philippines
Bahamas	Honduras	Saint Kitts and Nevis
Barbados	Iceland	Saint Lucia
Belize	Jamaica	Saint Vincent and the Grenadines
Bhutan	Jordan	Samoa
Bolivia	Kiribati	San Marino
Bosnia and Herzegovina	Lebanon	Senegal
Brunei	Lesotho	Serbia
Chile	Liechtenstein	Singapore
Costa Rica	Madagascar	Solomon Islands
Côte d'Ivoire	Malawi	South Sudan
Croatia	Malaysia	Sri Lanka
Democratic Republic of the Congo	Maldives	Suriname
Dominica	Mauritius	Swaziland
Dominican Republic	Mexico	Timor-Leste
Ecuador	Monaco	Tonga
El Salvador	Montenegro	Trinidad and Tobago
Ethiopia	Namibia	Tunisia
Fiji	Nauru	Tuvalu
Gambia	Nepal	Uruguay
Ghana	New Zealand	Venezuela
Grenada	Nicaragua	Zambia
Guatemala	Nigeria	Zimbabwe
Guyana	Panama	
	Papua New Guinea	
	Paraguay	

Would Remain Ineligible: 73 countries

Countries on the current restricted country list that would remain ineligible for general authorization under the Proposed Rule:

Afghanistan	Burundi	Equatorial Guinea
Albania	Cambodia	Eritrea
Algeria	Cameroon	Gabon
Andorra	Cape Verde	Georgia
Angola	Central African Republic	Guinea
Armenia	Chad	Guinea-Bissau
Azerbaijan	China♦	Haiti
Bahrain	Comoros	India♦
Belarus	Congo	Iran
Benin	Cuba	Iraq
Botswana	Djibouti	Israel
Burkina Faso		Kenya