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For the Record

The Nuclear Regulatory Commission (NRC) has spent nearly two years working with the Government Accountability Office (GAO) on its report on Research and Test Reactors (RTRs). Unfortunately, we are disappointed with the outcome. We believe GAO has provided a misleading and incomplete picture of our actions to ensure the safe and secure operation of RTRs. Both the classified and unclassified versions of the GAO report have three serious flaws:

1. The reports provide an unbalanced assessment of the efforts of NRC and RTR licensees to enhance security after Sept. 11, 2001.

Since September 11, 2001, the NRC has reviewed the security of every facility we regulate, including RTRs. Our review found places for improvements, and we ordered or gained legally-binding commitments that these improvements be made. The GAO's report ignores this.

In addition, we reject the GAO claim that the NRC ignored a report by Sandia National Laboratory about potential vulnerabilities at RTRs. While the NRC did have concerns about the report's conservative assumptions and modeling limitations, it served as our starting point and major input for the RTR security assessments. We used Sandia's studies, other scientific studies, and information from intelligence agencies to help us identify appropriate security upgrades for RTRs.

2. GAO's report misrepresents or excludes key facts, including those provided by its own experts.

Much of GAO's report hinges on a pre-decisional, sample document prepared by Idaho National Laboratory, and opinions from individuals from other labs and federal agencies. The INL sample document, which did not receive credible technical review, relies heavily on an assumption regarding the nature and extent of potential reactor damage that is not supported by scientific study or analysis. Accordingly, INL cautioned GAO that this sample document should not be relied upon. Similarly, Sandia's written comments fundamentally challenged the information GAO used to claim that the NRC had not considered appropriate terrorist capabilities.

3. GAO's report lacks sound technical bases or credible intelligence information in support of its recommendations.

The threat scenario laid out by the GAO had major limitations and lacked realism. While it might be possible that one step could be accomplished, the likelihood of the multiple complex steps in the postulated terrorist scenario is extremely low. Unfortunately, a detailed discussion of these limitations would require using classified information.

The NRC's assessments of security and analysis of radiation dangers considered a full range of adversary capabilities. These characteristics were based on a logical, clearly defined threat assessment. Using well-reviewed reports from several national laboratories and Department of Homeland Security guidelines, we assessed RTR security. Based on this work, NRC believes that the security at these facilities provides the proper amount of protection for people and the environment, and protects our national security. The NRC continues to inspect and evaluate RTR security, as well as safety, and will take additional actions as necessary.

[See NRC's Response to GAO Report](#)