



# Union of Concerned Scientists

Citizens and Scientists for Environmental Solutions

August 14, 2003

Roy Zimmerman, Director  
Office of Nuclear Security and Incident Response  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT: REDUCING THE RISK OF RADIOLOGICAL SABOTAGE BY CONTROLLING  
ACCESS TO SENSITIVE BUT UNCLASSIFIED INFORMATION**

Dear Mr. Zimmerman:

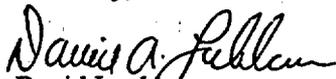
With good intentions, the Nuclear Regulatory Commission (NRC) removed considerable information from the public arena and limited access to other information that had been readily available prior to the tragic events of 09/11. For example, plant-specific risk assessment information (both probabilistic safety assessments developed by the plant owners and SPAR models developed by the NRC staff) has been removed. Access to information in Updated Final Safety Analysis Reports (UFSARs) has been severely restricted. It is our understanding that the purpose of this "information diet" is to reduce the chances of radiological sabotage using publicly available information.

We certainly support the notion of reducing the chances of radiological sabotage. Toward that common goal, we wonder what steps, if any, the NRC has taken to tighten controls of this information *inside* the nuclear power industry. As you know, 10 CFR 73.55 requires plant owners to protect against "an internal threat of an insider." If this information, when accessed by members of the public, greatly increases the chances of radiological sabotage, it seems that the insider threat is also heightened by ready access to this information. When I worked for a consulting firm prior to joining UCS, we'd routinely get the UFSAR updates on CDs from our clients and store them on our Local Area Network, which was readily accessible by any user on any computer hooked to the LAN, including remote users by modems. Likewise, when I had consulting assignments at nuclear power plant sites, it was quite easy to access their computer networks from home and review this information.

We hope that the NRC has taken steps to restrict access to information it considers "sensitive" both inside and outside the plant's fences. Absent such steps, the NRC seems to be deficient in taking all reasonable steps to guard against the insider threat specified in 10 CFR 73.55.

We know that the Commission won't permit you or any members of your staff from confirming or refuting our security concerns. If you could tug on your right ear next time we pass in the hallway out at White Flint to acknowledge receipt of this letter – without imparting any decision as to its merits – I would appreciate it.

Sincerely,

  
David Lochbaum  
Nuclear Safety Engineer  
Washington Office