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To: <MillstoneEIS@nrc.gov>
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USNRC

Douglas Schwartz
New London, CT

June 4, 2004

Dear Sirs:

This is submitted as part of the public comments on the EIS for the Millstone Nuclear Power Plant license renewal application.

I have two primary areas of concern:
1) the security of the facility against terrorist attack, and
2) the evacuation plan in the event of a radiation release.

SECURITY AGAINST ATTACKS:
I find the NRC's environmental impact assessment to be absurd in light of the current political reality. Terrorists are actively plotting to attack our nuclear power plants and will be likely doing so for decades into the future. On January 4, 2004, the London Times reported that flights from Britain and France to the United States had been cancelled in late December 2003 in part because of intelligence that terrorists were plotting to hijack these planes and use them to attack nuclear power plants on the East Coast. There has also been intelligence that the plane which crashed in Pennsylvania on September 11, 2001 may have been targeting a nuclear plant in that region. Terrorists are now actively plotting to make humans who reside in the vicinity of these plants an endangered species. Any environmental review process which does not actively incorporate these very real threats to the environment from terrorist attacks is a process which is an anachronism in the present era. Any environmental review process which does not insure the hardening of potential targets inside the Millstone facility is simply an example of a bureaucracy going through the motions of addressing past concerns while failing to address the present threat situation. The past process was designed to address ACCIDENTAL releases of radiation, while our current process must also incorporate threats from INTENTIONAL releases.

I would urge the following steps be taken to protect the environment in the vicinity of Millstone from intentional radiation releases:
* The construction of dry-cask storage capacity inside hardened bunkers should be prioritized and all fuel currently stored in the spent fuel pools should be promptly transferred into this much more secure storage.
* The security of the facility should be placed under federal control and removed from state jurisdiction. The guards must be adequately armed to protect against any potential threat, not handcuffed by ludicrous state statutes.
* The high-security fence must be completed.
* A no-fly zone should be implemented in the airspace over Millstone, and antiaircraft missiles positioned to automatically shoot down any aircraft entering this space. (see comments below)
* Vehicular barriers should be installed inside the facility to prevent the use of truck bombs against any susceptible targets.
* The control rooms should be hardened against all potential forms of attack, and be placed underground if necessary.

I find the disparity between the level of air defenses provided at nuclear plants and that at other known terrorist targets to be very troubling. There is essentially no antiaircraft defense at Millstone. Pilots straying into its airspace will be "interviewed." Contrast this with Washington, D.C., where other known targets are located. Washington is ringed with multiple missile batteries. Reproduced below are excerpts from a recent article published in the London Telegraph newspaper. At this suspected terrorist target (the

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D-Day commemoration), security is overwhelming and redundant. At known targets (East Coast nuclear plants) over here, air defenses are nonexistent. It must be assumed that Washington has decided the citizens residing near nuclear plants are expendable. If the French can expended the amount necessary to provide such overwhelming security for the D-Day ceremonies, why is it that we can not expend a modest amount to install a functional air defense system around our nuclear plants?

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Planes that breach D-Day air space 'will be shot down'
May 31, 2004
"Private pilots who stray into Normandy air space during the 60th anniversary of D-Day next weekend will be shot down, French officials said yesterday. With at least 16 heads of state, including the Queen and President George W Bush, attending the ceremonies, organisers are guarding particularly against an al-Qa'eda attack from the air. . . . An enormous network of radar equipment has been stretched between Deauville and Cherbourg, with Awacs early warning aircraft already in the skies. The aircraft will be joined this week by small, remote-controlled drones. Advanced Crotale anti-aircraft missiles have been primed and two squadrons of Mirage 2000 fighters are stationed nearby.

The French ministry of defence has spared no expense. It has established a temporary air base at Carpiquet, outside the city of Caen, as the hub of its defences. There, more than 800 soldiers will maintain round-the-clock surveillance, backed by more than 50 military helicopters. . . . At sea, fishermen and pleasure craft have been banned from the Seine Bay that stretches along the beaches. . . . A French carrier, Charles de Gaulle, and an American carrier, George Washington, will be patrolling the bay, which will also be swept for mines. There are unconfirmed reports that submarines will be used in the security precautions. On land, more than 9,000 French troops are arriving this week, supplementing the 6,300 gendarmes and 2,300 police officers already on duty."

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At the most recent Waterford, CT meeting, I obtained a copy of the NRC Fact Sheet, "Nuclear Security Enhancements Since Sept. 11, 2001." While the document is appropriately short on specifics, I find the little information revealed to be chilling. There appears to be an excessive emphasis on human security guards, as opposed to physical security enhancements (such as hardening targets) and automated responses (such as antiaircraft guns). Any security regime which places a disproportionate emphasis on human reaction to an invading force is prone to failures due to hesitancy to use appropriate force, human errors, fatigue, diversions, etc. Add to this the fact that (due to current state statute) the Millstone guards are armed with woefully inadequate weapons, and it is clear that Washington has done little in the almost 3 years since 9/11 that would indicate they are deadly serious about protecting our nuclear plants. The newspaper article excerpted above illustrates actions taken by people deadly serious about insuring the safety of those they are charged with protecting. The actions of the NRC since 9/11 strike me as those of a bureaucracy hopelessly unable to rapidly adjust to the current reality. I fear it will require another tragedy to change this mindset. If I could use a nuclear analogy to suggest the appropriate security configuration for our nuclear plants: the concept of a walk-away design, which is now incorporated into the latest reactor designs. If the system malfunctions, it shuts down automatically, without moving parts. Security should be configured in a similar manner, with almost human intervention required. Control rooms and fuel storage should be hardened appropriately so as to make them essentially impregnable.

As a result of recent NRC meetings in Waterford regarding this license renewal application, I have learned that much has been done to upgrade the security of the facility in the past few years. Yet the intelligence is that terrorists are actively targeting nuclear plants on the East Coast. Do they know something regarding the vulnerabilities of these plants that we do not yet understand? I would urge an immediate engineering analysis be undertaken to attempt to uncover vulnerabilities which could be exploited by terrorists. Presumably, this has already been done. I would urge a redoubling of efforts to understand these vulnerabilities, and especially to analyze threats from missiles launched from both land and water.

Unless the sorts of steps outlined above are fully implemented, Millstone will pose a grave potential threat to the local environment.

EVACUATION PLANS
I have grave concerns about the evacuation plan in the event of a radiation release. The intent of such

plans is to remove people from the danger of radiation exposure, and uses the logic that if the radiation release is in the local region, the best plan is to remove the population from this region. I believe the current plans maximize the exposure many people will receive. The logic used is flawed, in that the radiation will be in a specific portion of the local region, the local atmosphere. The way to insure the maximum number of people are protected is to insure they are isolated from the local atmosphere to the greatest extent possible. The current plan insures the maximum number of people will be maximally exposed to this atmosphere. The greatest threat is from the long-term health complications of inhaled particles, yet people are directed to evacuate by automobile during the hours when the possibility of inhaling high doses of particles is at its peak. Rather than direct people to get into vented automobiles and then sit in traffic while a radioactive cloud is overhead, it would make more sense to direct them to remain inside buildings, inside sealed rooms, for a period up to several days until the local atmosphere has been naturally cleansed of radiation. The current plan is designed to instill maximum fear and chaos. It would be preferable to educate the public to the dangers of inhaled radioactive particles and the means of preventing inhalation. Evacuation should only be done days or weeks after a release, when monitoring teams have uncovered high levels of radiation which would make specific local areas uninhabitable due to long-term radiation.

Sincerely,

Douglas Schwartz