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Date: 12/6/04 1:31PM
Subject: Supplement to 2.206 on GE nuclear power structural vulnerabilities

To: Peter Tam, U.S. Nuclear Regulatory Commission, Nuclear Reactor Regulation, 10 CFR 2.206 Petition Manager

Cc: Roy Zimmerman and Glenn Tracey, NRC Nuclear Security Incident Response

Re: Supplemental material to Nuclear Security Coalition Petition for Emergency Enforcement Action on Structural Vulnerability of the Elevated Irradiated Fuel Storage Pools in GE Mark I & II Boiling Water Reactors (BWR).

The Associated Press reported on November 30, 2004 that a drunken pilot operating a private aircraft "buzzed" Pennsylvania's Limerick nuclear power station (a two unit GE Mark I BWR).

See "Drunken pilot who buzzed nuclear power plant gets 6-23 months in jail"

<http://pennlive.com/newsflash/topstories/index.ssf?/base/news-22/1101837244166360.xml&storylist=penn>

The petitioners submit this news account as supplemental material in support of their August 10, 2004 request for emergency enforcement action regarding the structural vulnerability of the large inventory of irradiated fuel in rooftop storage ponds in the GE Mark I and Mark II Boiling Water Reactors. The documented incident demonstrates the emergency nature of the petitioners' requested action by noting that according to the AP account despite the tracking by NORAD and pursuit by a police helicopter the pilot came within ¼ mile of the nuclear power station at an altitude of 100 feet, (approximately the same level as the top of the Mark I elevated irradiated fuel storage pond containing 500 to 550 tons of high-level nuclear waste.)

Petitioners submit that had the pilot been a member of al Qaeda or another terrorist organization intent on crashing a potentially explosive-laden private aircraft into the Mark I to create a radiological catastrophe involving the irradiated fuel there would have been very little time margin, a matter of seconds, to take offsite defensive actions against such an attack. This further justifies the petitioners' request for emergency enforcement of onsite defensive actions to air attack to address the documented structural vulnerability of Limerick and the other 31 GE BWR unit's elevated high-level nuclear waste storage ponds.

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