PERMON RULE PRE 73-12 (69FR 64690)

DOCKETED **USNRC** 



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OFFICE OF SECRETARY **RULEMAKINGS AND** ADJUDICATIONS STAFF

Please upgrade the Design Basis Threat (DBT) for U.S. nuclear power stations

1) revising DBT regulations to require NRC and the nuclear power industry to contemplate and prepare for (a) an attack of nuclear power stations by air and; (b) an attacking force--by land, water and/or air--at least equal to the 19 terrorists effectively coordinated in multiple teams as were the 9/11 attacks; (c) attackers utilizing a full range of potential weapons of which a group such as Al Qaeda would be capable, including heavy caliber automatic weapons, shaped charges, shoulder-fired rockets, mortars, anti-tank weapons, and large quantities of explosives; (d) a minimum of three insiders assumed to have both passive and active capacity; (e) an attack by an explosive-laden land vehicle that is not limited to the current four-wheel Sport Utility Vehicle or small truck but inclusive of a full range of larger vehicles and;

2) a requirement "under a time urgent schedule" for the construction of shields at reactor sites consisting of a relatively inexpensive and quick-to-assemble system of steel I-beams and steel cabling ("Beamhenge") to obstruct the angle of air attack at stand-off distances from the reactor building, fuel pool and other safety-related assets so that hijacked, rented or private aircraft (potentially carrying explosives) attempting to deliberately crash into a reactor site would be torn up in the "Beamhenge" shield effectively reducing the impact and penetration force on safety-related structures. The shield effort is focused on reasonably reducing the public's risk of terrorists successfully using nuclear power stations for radiological-enhanced sabotage. Thank you. Ann Fonfa

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