

STRAUS-EDWARDS ASSOCIATES ARCHITECTS



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December 21, 2004 (10:41am)

December 10, 2004

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

RE: Public Comment on petition: "Upgrading the Design Basis Threat Regulations for Protection Against Terrorist Attacks on Nuclear Reactors"

To Whom It May Concern:

I would like to submit my comment regarding the Petition for Rulemaking, for "Upgrading the Design Basis Threat Regulations for Protection Against Terrorist Attacks on Nuclear Reactors". filed on July 23, 2004, by the **Committee to Bridge the Gap (CBG)** and posted in the *Federal Register* on November 08, 2004, Volume 69, Number 215.

Please consider my urgent request; in accordance with the referenced petition, that that NRC upgrade the Design Basis Threat (DBT) for U.S. nuclear power stations by implementing the recommendations contained within that petition, as follows:

- 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) Implementing 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, in advance, for your consideration of this request.
Sincerely,

Lydia Straus-Edwards, AIA, NCARB

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