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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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

**Subject: PRM-73-12 (Rulemaking petitions: Committee to Bridge the Gap)**

To Whom It May Concern:

On the federal docket to amend 10 CFR 73 is a concept forwarded by a group known as the 'Committee To Bridge the Gap', concerning a rule-making effort regarding increased security at nuclear facilities. Prima facie, it sounds like a good idea... until you get to the fine print. They propose changing the DBT ("Design-Based Threat") methodology for protecting nuke plants, so that our planning for security would anticipate a threat like that of the 9/11 attacks in NY and at the Pentagon. It does prompt me to wonder why we are only now, 3 years later, seriously considering this type of attack on nuclear facilities – especially when physicist Amory Lovins first raised the issue in the '60s before we even built them. But never mind that, for now.

No, that's not the weird part of this proposed 'rule-making' change.

While certainly most Americans would agree that security at the nation's nuclear facilities should be top-notch (might be a better idea and much more effective to simply shut them down, thereby removing the threat altogether...), this proposal contains a patently goofy concept: "Beamhenge". Constructing I-beams and a cable 'net' around the sensitive parts of a nuclear plant.

Considering the "stand-off distance" from a nuke plant is something significant to mitigate this kind of threat – like a quarter-mile – not to mention some of the engineering principles that must be satisfied to make "Beamhenge" actually work, I don't see how this might be construed as *cheap*, as the Committee determined. Nor for that matter, feasible at any price. Perhaps you should consider a no-fly zone, a required military escort within certain distances of nuke plants... or again, just shutting them down, as a better set of alternatives for security. And you might consider that alternative sources of energy production to replace nuclear power wouldn't have the same level of threat if a security breach did occur. I can't imagine terrorists would ever bother to strike against solar panels, a wind farm, or wave-energy facilities. But then, I *can* imagine that the Committee to Bridge the Gap might propose an ill-conceived and exorbitantly expensive way to stop them anyway.

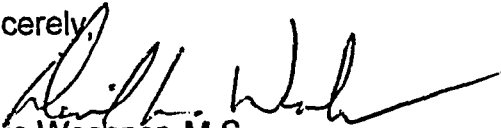
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In summary, I propose we immediately stop funding for the DGI ("Department of Goofy Ideas", formerly known as the Committee to Bridge The Gap), and turn the attention of the federal government back to some useful discussions, like how to: educate children; care for the elderly; end the war in Iraq; and house the homeless.

Thanks for listening.

Sincerely,



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