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From: "Helen Corneli" <hfmc@cybermesa.com>
To: <SECY@nrc.gov>
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Subject: Safeguarding from nuclear disaster

January 21, 2005 (10:35 am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Dear Members of the Nuclear Regulatory Commission

I write, as a past member (in the late 1980's) of the state of Wisconsin's citizen's advisory group, The "Radiation Protection Council", to express my deep concerns about the vulnerability to attack of spent fuel rods at our nuclear power plants. Those pools of water (which in my time in Wisconsin, we stored very near to Lake Michigan, for example) aim to prevent the heat from their residual radioactivity from melting the spent rods. Driving by those structures gave any observant citizen pause, even in those less dangerous days. One structure I saw separated me, on the highway, from the 'blue pool' by a chain link fence! Many similar pools are open to the air or housed in light-duty buildings. A plane attacking from above could drain the pool, destroy backup safety systems, and ignite the fuel--resulting in radioactivity pollution to the surrounding environment in amounts that would make Chernobyl look like a marshmallow roast! Even a well placed mortar attack could cause devastation.

I have heard of the widely forgotten incident of 1972, when three Americans with pistols and hand grenades hi-jacked a Southern Airlines Flight 49, and ordered the plane to fly to Oak Ridge, Tennessee. They used the threat of plowing into a reactor to get settlement for their demands. The intruder of February 7, 1993, who drove his vehicle through gates into the "protected" area of Three Mile Island nuclear power station and into the turbine building, had no explosive load. And today, living 35 miles as the crow flies, from Los Alamos, I have somber thoughts about the often challenged safety provisions of that facility, and of Sandia Labs, on the outskirts of Albuquerque.

A Petition for Rulemaking to the U.S. Nuclear Regulatory Commission (posted in the Federal Register on November 8, 2004, Volume 69, Number 215) for "Upgrading the Design Basis Threat Regulations for Protection Against Terrorist Attacks on Nuclear Reactors" asks that the NRC upgrade the Design Basis Threat (DBT) for U.S. nuclear power stations. Regulations should require the nuclear power industry to prepare for a possible air attack on nuclear power stations by constructing shields of inexpensive, available, and easy to erect I-beams and steel cabling to obstruct any angle of attack at to the reactor building, fuel pool and major safety-related assets. Aircraft, whether or not carrying explosives, attempting to crash into a reactor site would be effectively prevented from so doing by such a shield. This would seem to be a worthwhile effort at reducing the public's risk of terrorists using nuclear power stations for radiological-enhanced sabotage.

The history of this idea is not encouraging. I remind you that at the industry's request, NRC management zeroed out the budget for the OSRE program. It was restored by publicity engendered by a whistleblower and action by then President Clinton. However, the nuclear industry continues to drag its feet on security upgrades. This augurs ill for the draft NRC policy to turn over security testing to an industry self assessment program to begin its pilot phase in September 2001. Certainly the public has heard very little about any such self policing.

And even after September 11, a Government Accountability Office (GAO) report had to conclude, in September 2004, that NRC's new security initiatives were "largely a paper review." No site visits verified compliance, no request for relevant documents built a record of efforts at protection. Indeed, GAO thinks it will be at least three more years before NRC will have data to validate whether site-specific upgraded security plans are adequate.

To a thinking, tax paying, and relatively well informed citizen, this seems a sorry state of affairs. I hope that you will return to the intention of the original OSRE program, and begin requiring and enforcing a solid protective system for our nuclear power plants. I have not been able to conduct a review of the profits of energy companies, but I do not think the industry is in trouble--unless, perhaps, they have overbuilt generating systems.

Very sincerely,

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SECY-02

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SEC 4-02

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