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**PETITION RULE PRM 73-12**  
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**Project On Government Oversight**  
 Exposing Corruption, Exploring Solutions

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Date: January 24, 2005  
 To: Secretary, U.S. Nuclear Regulatory Commission  
 Washington, DC 20555-0001  
 ATTN: Rulemakings and Adjudications Staff  
 From: Peter Stockton  
 Senior Investigator  
 Project On Government Oversight  
 Re: PRM-73-12 (Committee to Bridge the Gap Petition for Rulemaking)

Both issues involved in the Committee to Bridge the Gap Rulemaking Petition are important and basic to the protection to nuclear power plants.

The "Beamhenge" proposal makes sense to POGO. Even if an attacking aircraft destroyed the beams, cables and netting, it would at least redirect the aircraft from a direct hit on its target -- spent fuel, containment or critical support facilities. Another option to consider, which POGO discussed with the Nuclear Regulatory Commission is the use of barrage balloons for the same purpose. We also think the deflection concept could be explicitly extended to the issue of water and land access to the plants. For example, buoys could establish a water perimeter at points of water access to plants (such as Indian Point) and land perimeters could be expanded and strengthened. Boat bombs should also be considered a serious threat, especially after the USS Cole bombing of 2000.

The other issue is NRC's DBT. The major problem with security at nuclear power plants is that it is driven by NRC's dumbed-down and totally unrealistic DBT. POGO has recommended a DBT of at least squad-size -- which for the Army Special Forces is 12 people, and for the Navy SEALs is 14.

The Department of Energy in September 2004 finally adopted a robust and realistic DBT that is more than three times the size of the NRC's. NRC's weak justification is that their DBT is all that a private guard force can be expected to handle. However, it should be noted that DOE's sites are protected by private guard forces. In addition, DOE's DBT includes far more lethal adversarial weapons and a far larger truck bomb.

No one can take any comfort in nuclear power plant security until these DBT issues are addressed. POGO believes it is important to have a rulemaking procedure in which interested parties other than the industry can be heard on these critical issues.

POGO □ 666 11<sup>th</sup> Street, NW, Suite 500 □ Washington, DC 20001  
 (202) 347-1122 □ fax: (202) 347-1116 □ email: pogo@pogo.org □ www.pogo.org

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**From:** Carol Gallagher  
**To:** Evangeline Ngbea  
**Date:** Tue, Jan 25, 2005 10:58 AM  
**Subject:** Comment letter on PRM-73-12

Attached for docketing is a comment letter on the above noted PRM from Peter Stockton, Project on Government Oversight, that I received via the Rulemaking website on 1/24/05.

Carol