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From: Ellen Koivisto and Gene Thompson <offstage@earthlink.net>
To: <SECY@nrc.gov>
Date: Wed, Jan 19, 2005 7:35 PM
Subject: ATTN: Rulemakings and Adjudications Staff re. Upgrading Design Basis Threat Regulations

Nukes are not our friends. We must treat them as the dangerous potential disaster they are. To that end, please upgrade the Design Basis Threat (DBT) for U.S. nuclear power stations, revising DBT regulations to require NRC and the nuclear power industry to contemplate and prepare for an attack of nuclear power stations by air by constructing shields consisting of (inexpensive and quick-to-assemble) steel I-beams and steel cabling 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.

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RULEMAKINGS AND
ADJUDICATIONS STAFF

In 1998, at the behest of industry, NRC management zeroed out the budget for the OSRE program. When it was restored, the nuclear industry continued to stonewall security upgrades as "unnecessarily sophisticated and overly expensive", culminating in a draft NRC policy to turn over security testing to an industry self assessment program to begin its pilot phase in September 2001. Hey, let's let the terrorists guard the hen house.

In the aftermath of the September 11 attack, the Nuclear Regulatory Commission has attempted some reforms but they are far from protective. In September 2004, a Government Accountability Office (GAO) report concluded that NRC's new security initiatives were "largely a paper review." The NRC did not visit sites to verify compliance nor request facilities to submit documents that supported security upgrades. In fact, GAO concluded it will be at least three more years before NRC will have data to validate whether site-specific upgraded security plans are adequate.

OK? Get on the job.

Ellen Koivisto

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