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PETITION RULE #

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134

From: <rmharman@auros.org>
 To: <SECY@nrc.gov>
 Date: Wed, Jan 19, 2005 4:26 PM
 Subject: Improve Madatory Security Standards at Nuclear Power Plants

The Committee to Bridge the Gap (CBG) has filed a Petition for Rulemaking to your 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." I wish to register with you my support of their petition.

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USNRC

January 26, 2005 14, 2004 (3:09pm)

OFFICE OF SECRETARY
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The petition most crucially requests that you 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.

In 1998, at the behest of industry, NRC management zeroed out the budget for the OSRE program only to be restored through media exposure by an agency whistleblower, CBG, and action by President Clinton. However, 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.

In the aftermath of the September 11 attack, your 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.

If a nuclear plant's containment shell and reactor core, or spent fuel pools, are ever breached, a terrible explosion of radioactivity, on a par with the Chernobyl accident, would ensue. Millions of Americans would be placed in harm's way. Unfortunately, America's nuclear plants are highly vulnerable to attack. Fortunately, such a cataclysm is preventable.

Please act on the CBG petition, and improve the security of all Americans.

Sincerely,
R Michael Harman

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SECY-02

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