

DOCKET NUMBER

PETITION RULE PRM

73-12

(69FR 64690)

DOCKETED
USNRC

January 28, 2005 14, 2004 (4:45pm)

From: "John Runkle" <jrunkle@mindspring.com>
To: <secy@nrc.gov>
Date: Mon, Jan 24, 2005 4:19 PM
Subject: ATTN: Rulemakings and Adjudications Staff, PRM-73-12

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attached and inserted below, please find our comments:

198

CONSERVATION COUNCIL OF NORTH CAROLINA

P.O. Box 12671

Raleigh, N.C. 27605

919-839-0006

January 20, 2005

VIA MAIL & EMAIL

Secretary

U.S. Nuclear Regulatory Commission

Washington, D.C. 20555-0001

ATTN: Rulemakings and Adjudications Staff

Re: Petition to Urgently Upgrade Nuclear Security Requirements, PRM-73-12

Dear Sir:

The Conservation Council of North Carolina supports the Petition for Rulemaking by the Committee to Bridge the Gap filed with the NRC on or about July 23, 2004, which was published in 69 Fed. Reg. 215 (November 8, 2004), for "Upgrading the Design Basis Threat Regulations for Protection Against Terrorist Attacks on Nuclear Reactors."

The Conservation Council intervened in the licensing for several nuclear plants in the 1970's and 1980's. In the licensing of Carolina Power's Shearon Harris Nuclear Power Plant, we raised and litigated the issue of the ability of the plant's security plan to prevent the theft, compromise or dispersal of radioactive material. We continue to recognize the clear and compelling necessity to provide adequate safeguards from threats.

However, the rules have not substantially changed since then and the Design Basis Threat (DBT) does not reflect the current situation. The time is overdue for the NRC to completely reassess the risk from organized, well-armed and well-financed terrorists, and to upgrade the DBT to prepare for coordinated attacks from multiple assault teams, with insider knowledge and even insider assistance.

Template = SECY-067

SECY-02

Nuclear power plants should be at the top of our terrorists concerns as they have the potential for significant damage to the public in the wrong hands. A paper review by the NRC is not enough; there must be strong rules and real inspections.

Please notify me at the address above of any action you take on this Petition.

Sincerely,

John D. Runkle

General Counsel

Mail Envelope Properties (41F5666E.13E : 11 : 8510)

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Creation Date: Mon, Jan 24, 2005 4:19 PM
From: "John Runkle" <jrunkle@mindspring.com>

Created By: jrunkle@mindspring.com

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Options

Expiration Date: None
Priority: Standard
Reply Requested: No
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Concealed Subject: No
Security: Standard