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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

January 24, 2005

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
(sent via email)

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Attention: Rule-making and Adjudication Staff

Re: Support - Committee to Bridge the Gap petition

Dear Secretary,

We write on behalf of the California chapters of Physicians for Social Responsibility. Composed of over 10,000 medical professionals and supporters, we wish to express our deep concern about the possibility of terrorist events at the San Onofre and Diablo Canyon nuclear reactors, and the public health catastrophe that would ensue.

Two enormous vulnerabilities must quickly be addressed.

1. Spent fuel pools are vulnerable to land and air attack. An excess of 2,500 tons of highly radioactive spent fuel assemblies reside at California's nuclear reactor sites. The buildings that house spent fuel rods are designed to remain intact in case of an earthquake, but no provide no other security. The structures are typically light-duty. An airplane collision or coordinated land attack could drain the pools, destroy backup safety systems, and ignite the fuel. The resulting fire of such an accident has been estimated to deliver radioactivity into the environment in amounts in excess of the Chernobyl accident.

2. Spent fuel pools and operating reactors are acutely vulnerable to air attack. The appalling September 11th attack employed multiple airplanes focused on a single target. The containment vessels for Units 1 & 2 at Diablo Canyon and for Units 2 & 3 at San Onofre should therefore be analyzed for withstanding the impact of multiple jumbo jetliners striking the same area of a containment dome. If the containment vessel or reactor core is breached and/or the plant's pumps and cooling systems are ever compromised, it could result in a Chernobyl-like accident - and could similarly lead to tens of thousands of cancer deaths.

Nuclear terrorism is not some radical far-fetched notion, but a terrible possibility. In the aftermath of the first World Trade Tower attack in 1992, police discovered in-depth plans to attack nuclear power facilities. Further, Graham Allison, director of Harvard's Belfer Center for Science and International Affairs, writes in the best-seller, "Nuclear Terrorism," that "the American Airlines flight that struck the North Tower of the World Trade Center could just as readily have hit the Indian Point nuclear power plant."

The Committee to Bridge the Gap petition offers constructive ideas on thwarting the two outstanding vulnerabilities at America's nuclear power plants. Inexpensive steel I-beams and cabling could obstruct an air attack. And improving the Design Basis Threat to thwart a 9/11 type attack is surely reasonable.

If the NRC's cares about public health and sound science, we are confident that the commission will swiftly enact the petition.

Cordially Yours,

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