

DOCKET NUMBER

PETITION RULE PRM

73-12
(69FR 64690)DOCKETED
USNRC

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

From: "Micah Walker Parkin" <mwalker@all4energy.org>
To: <secy@nrc.gov>
Date: Mon, Jan 24, 2005 6:59 PM
Subject: comments on CBG rulemaking petition

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

January 20, 2005

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Nuclear Regulatory Commission

Re: Support for the CBG rulemaking petition

To Whom It May Concern:

The Alliance for Affordable Energy is a nonprofit organization dedicated to promoting affordable and environmentally responsible energy policies. We believe that there is an urgent need for action to protect reactors, and thus, citizens from potentially devastating terrorist attacks. We agree with the Committee to Bridge the Gap (CBG) that current security regulations are woefully inadequate and that protections against terrorist attacks on nuclear facilities must be upgraded expeditiously. We support the CBG rulemaking petition, which would require protection of nuclear facilities against air attack. We are horrified that three years after the 9/11 attacks, there still is no such protection. The proposal recommends construction of "Beamhenge" shields, constructed of steel I-beams, with cabling between them, at stand-off distances from sensitive reactor structures, so that an incoming plane crashes into the shield rather than the reactor, spent fuel pool, or critical support facilities, preventing massive radioactive release. The second component of the Rulemaking Petition, with which we also agree, is to upgrade the Design Basis Threat (DBT) regulations to require protection against at least the number and capabilities of the attackers on 9/11. Current DBT regulations -- unchanged for a quarter of a century -- require protection against only three attackers on foot, acting as a single team, with weapons no greater than hand-carried automatic weapons, plus the possible assistance of one insider. The Commission has conceded that the DBT still does not approach 9/11 levels, and we encourage NRC to remedy this right away. The Rulemaking Petition would rectify this deficiency by requiring protection against attackers in at least the numbers and with at least the capabilities seen on 9/11. We have had ample warning and time to address these inadequacies, and yet our citizens remain vulnerable. To not take preventative action immediately would be extremely irresponsible.

Sincerely,

Micah Walker Parkin

Alliance for Affordable Energy

Template = SECY-067

SECY-02

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Mail Envelope Properties (41F58BDD.423 : 23 : 13347)

Subject: comments on CBG rulemaking petition
Creation Date: Mon, Jan 24, 2005 6:51 PM
From: "Micah Walker Parkin" <mwalker@all4energy.org>

Created By: mwalker@all4energy.org

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MESSAGE	2402
TEXT.htm	8184
Mime.822	12632

Date & Time

Monday, January 24, 2005 6:51 PM

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard