

GIBSON GRAY

3630 Kale Drive
Lumberton, North Carolina 28358

DOCKETED
USNRC

212

February 3, 2005 (11:53am)

DOCKET NUMBER
PETITION RULE FR

73-12
(69FR 64690)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

January 21, 2005

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 2055-0001

Attn: Rulemakings and Adjudications Staff

Dear Sir:

Last year the Committee to Bridge the Gap filed a Petition for Rulemaking to the Commission. It was posted in the Federal Register on November 8, 2004, Volume 69, Number 215. The title of the petition was "Upgrading the Design Basis Threat Regulations for Protection Against Terrorist Attacks on Nuclear Reactors." Your agency has now opened the petition for public comment. I supply my comments below.

The petition requests that NRC 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 on nuclear power stations by air by constructing shields consisting of inexpensive and easily assembled 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. The effect would be that hijacked, rented or private aircraft (potentially carrying explosives) and attempting to deliberately crash into a reactor site would be torn up in the "Beamhenge" shield, thus 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 radiologically enhanced sabotage.

In earlier years an attempt was made to have this sort of protection adopted by the NRC management, but the protection was ultimately not adopted. Certainly the attack of September 11, 2001 makes clear the need for the protection noted above.

I shall appreciate your consideration of my comments. I hope that the Commission will adopt the protection noted earlier in my comments.

Sincerely yours,



Gibson Gray, Ph.D.
Retired Chair
Department of Political Science
UNC-Pembroke

Template = SECY-067

SECY-02