

217

DOCKET NUMBER

PETITION RULE PRM

73-12

(69FR64690)

From: Marvin I Lewis <marvlewis@juno.com>
To: <SECY@nrc.gov>
Date: Thu, Jan 20, 2005 10:01 AM
Subject: Comments needed by 1/24 to improve reactor security Comments to improve reactor security

DOCKETED
USNRC

February 3, 2005 (11:53am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

The Commissioners of the Nuclear Regulatory Commission
Dear Commissioners,

I submit this comment in support of the Design Basis Threat rulemaking to improve reactor security presented by the Committee to Bridge the Gap.

First, it would require protection of nuclear facilities against air attack. Astonishingly, three years after 9/11, 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 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. NRC in 2003 did issue secret "Orders" that marginally increased the DBT, but the legality of doing so in negotiation with the industry while the public was frozen out of the process completely has been challenged in court, and the Commission has conceded that the DBT in the Orders still does not approach 9/11 levels. 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. It seems a very minimal response to a clear and immediate 9/11 type threat.

I, respectfully, request that the many 'Lessons Learned' in the TMI investigations not be forgotten and that the added safeguards, if any, required by the Lessons Learned are not sacrificed during this era of added alertness to a terror threat.

Also The Environmental Coalition on Nuclear Power was in the midst of a 'contention on airplane crashes' when their contention became mute due to the accident at TMI#2. I respectfully suggest that the NRC contact Judith Johnsrud, Ph. D., <johnsrud@uplink.net> concerning the strictures that ECNP was proposing to alleviate the problem of aircraft crashes into nuclear power plants.

Respectfully submitted,

Marv Lewis
3133 Fairfield St.
Phila., PA 19136
215 676 1291
marvlewis

CC: <nirsnet@nirs.org>, <johnsrud@uplink.net>

Template = SECY 067

SECY-02

Mail Envelope Properties (41EFC7C4.750 : 15 : 38736)

Subject: Comments needed by 1/24 to improve reactor security Comments to improve reactor security
Creation Date: Thu, Jan 20, 2005 10:00 AM
From: Marvin I Lewis <marvlewis@juno.com>
Created By: marvlewis@juno.com

Recipients
nrc.gov
owf5_po.OWFN_DO
SECY (SECY)

uplink.net
johnsrud CC

nirs.org
nirsnet CC

Post Office
owf5_po.OWFN_DO

Route
nrc.gov
uplink.net
nirs.org

Files	Size	Date & Time
MESSAGE	2508	Thursday, January 20, 2005 10:00 AM
Mime.822	3601	

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

Concealed Subject: No
Security: Standard