

From: "Ken Lassman" <kel@srskansas.org>
 To: <SECY@nrc.gov>
 Date: Thu, Jan 20, 2005 10:06 AM
 Subject: For public input on petition to upgrade power plant security

DOCKET NUMBER

PETITION RULE FROM

73-12

(69FR 64690)

Dear Secretary,

DOCKETED
 USNRC

February 3, 2005 (11:53am)

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

I fully agree for the need to fully upgrade the Design Basis Threat of all existing and future facilities along the lines outlined below, particularly providing full protection of spent fuel storage areas. The impasse at Yucca Flats has made it essential that we stop assuming that our power plants won't need secure long term storage areas that are as hardened as the fission area. The "beamhenge" concept outlined below should be adopted.

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I feel that this is the most important security threat our nation faces, as both candidates for presidents also agreed on. Please do the right thing.

Ken Lassman
 1357 N 1000 Rd.
 Lawrence, KS 66046

Comments Needed by January 24, 2005

Harvard professor and Clinton Administration arms control expert, Graham Allison, soberly discusses the problem of nuclear power plant vulnerabilities:

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, forth miles north of Times Square . . . The consequences of an attack on a nuclear plant would depend largely on where the plane hit. If the aircraft penetrated the containment dome, the attack could cause the reactor to melt down, releasing hundreds of millions of curies of radioactivity into the surrounding environment, hundreds of times that released by the Hiroshima and Nagasaki bombs. We already know what such an incident would look like. In April 1986, an accident explosion inside the Soviet nuclear reactor at Chernobyl ignited a powerful fire that raged for ten days. The resulting radiation forced the evacuation and resettlement of over 350,000 people and caused an estimated \$300 billion of economic damage, and is likely to lead ultimately to tens of thousands of excess cancer deaths among those exposed to the fallout.

An even more vulnerable target at a nuclear plant is the building that houses the spent fuel rods, which are stored in pools of water to prevent the heat from their residual radioactivity from melting them. Designed to remain intact in case of an earthquake, these structures are open to the air in some instances and housed in only light-duty buildings in others, which means that a plane attacking from above might drain the pool, destroy backup safety systems, and ignite the fuel. The resulting fire would spew radioactivity into the environment in amounts that could reach three or four Chernobyls.

Last year, Committee to Bridge the Gap (CBG) filed a Petition for Rulemaking to the U.S. Nuclear Regulatory Commission (posted in the

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SECY-02

Federal Register on November 8, 2004, Volume 69, Number 215) for "Upgrading the Design Basis Threat Regulations for Protection Against Terrorist Attacks on Nuclear Reactors."

The nuclear agency has now opened the petition for public comment. The NRC needs to hear your concerns about vulnerabilities at America's nuclear power plants.

The petition most crucially 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 of nuclear power stations by air by constructing shields consisting of (inexpensive and quick-to-assemble) 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 so that hijacked, rented or private aircraft (potentially carrying explosives) attempting to deliberately crash into a reactor site would be torn up in the "Beamhenge" shield 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 radiological-enhanced sabotage.

In 1998, at the behest of industry, NRC management zeroed out the budget for the OSRE program only to be restored through media exposure by an agency whistleblower, CBG, and action by President Clinton. However, the nuclear industry continued to stonewall security upgrades as unnecessarily sophisticated and overly expensive, culminating in a draft NRC policy to turn over security testing to an industry self assessment program to begin its pilot phase in September 2001.

In the aftermath of the September 11 attack, the Nuclear Regulatory Commission has attempted some reforms but they are far from protective. In September 2004, a Government Accountability Office (GAO) report concluded that NRC's new security initiatives were "largely a paper review."

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From: "Ken Lassman" <kel@srskansas.org>

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