

From: clean earth <enabler2@comcast.net>  
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Date: Thu, Jan 20, 2005 12:25 PM  
Subject: Upgrade Safety Requirements

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Dear Mr. Secretary:

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USNRC

February 3, 2005 (11:53am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

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.

Such threats are real possibilities. In November 1972, three Americans with pistols and hand grenades commandeered a Southern Airlines Flight 49, and ordered the plane to fly to Oak Ridge, Tennessee, and threatened to plow the plane into a reactor unless their ransom was met. And on February 7, 1993, a distraught intruder drove his station wagon onto Three Mile Island nuclear power station property, crashing through gates in the "protected" area of the nuclear facility before wrecking the vehicle into the turbine building. He evaded security for several hours before being arrested. Fortunately, he carried no explosives.

Sincerely yours,

Fred Nadelman, LMSW  
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Savannah, GA 31404  
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