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From: Carol Gallagher
To: Evangeline Ngbea
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Subject: Comment letter on PRM-73-12

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Attached for docketing is a comment letter on the above noted PRM from Eugene N. Cramer that I received via the Rulemaking website on 1/23/05.

Carol

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PRM-73-12 COMMENTS ON THE BEAMHENG PROPOSAL

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COMMENTS ON THE BEAMHENG PROPOSAL

I live less than 10 miles from San Onofre Nuclear Generating Station.

After reviewing the first 37 comments, I concluded:

- 1) The Beamhenge proposal is misleading, in that it is a diversion of resources better spent elsewhere;
- 2) The Beamhenge proposal presumes that this large additional resource is sufficient at nuclear power plants;
- 3) The Beamhenge proposal is supported by persons who are not aware of present capabilities to withstand terrorist threats;
- 4) The Beamhenge proposal should be denied.

1) The Beamhenge proposal is misleading, in that it is a diversion of resources better spent elsewhere.

If one is to assume that terrorists have the goal of bringing down the American economy, then there are many easier and more worthwhile targets. A few dozen well-placed rifle bullets will bring down the electricity grid nationally -- transformers and switchgear are distributed across the United States, unguarded and unshielded. A few bombs placed in local banks would cause an immediate shutdown of the banking system. There are many stockpiles of dangerous chemicals, unshielded and unguarded, open to a few bombs. A deliberate attack on one unguarded slice of the American economy would cause massive panic for no real cost to the attackers.

2) The Beamhenge proposal presumes that this large additional resource is sufficient at nuclear power plants.

Next year, a different group of petitioners could very well decide that additional safety measures are required. Suppose they petitioned that the reactors should be placed underground, or that six or ten feet of earth be placed on top of the Beamhenge. Then two years later, a third group (those now concerned about transportation of fresh fuel) petitions that every reactor *and* its fuel preparation plant be placed underground at the same location. Then a fourth group (those concerned about waste disposal) petitions that every reactor, its fuel preparation, *and* its waste disposal be placed underground at the same location.

There comes a time when sensible persons should agree that 'enough safety is enough'.

3) The Beamhenge is supported by persons who are not aware of present capabilities to withstand terrorist threats.

Most of the first letters are simple cards, in essence saying "I support Beamhenge" – with no reasons given.

This is reminiscent of a detailed survey taken in France, when public support in 2003 for nuclear electricity rose from below 50% to more than 80%. The detailed survey showed that 70% of the people are frightened of nuclear waste, but only 6% base their fears on "real facts" while 94% base on "facts imagined to be true".

To the suddenly frightened mind, presented with the terrorist threat in a 9/11 attack, nothing has been done to oppose this, and therefore "SOMETHNG MUST BE DONE! ”.

4) This Beamhenge proposal should be denied.

Nuclear power reactors are constructed within large, thick, solid, concrete-and-steel buildings. Their emergency systems are in similar sturdy buildings. A great deal of thoughtful engineering safety tests has lead the design of these systems.

The Beamhenge add-on is neither necessary nor sufficient if one demands the ultimate in public safety.