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FROM: Catherine Quigg, 838 Harriet Lane, Barrington, Illinois 60010 Re: Petition for Rulemaking by the Committee to Bridge the Gap, PRM-73-12 I strongly support the Committee to Bridge the Gap (CBG) petition for the following upgrade protections against terrorist attacks on nuclear facilities: 1] The construction of "Bearnhenge" shields constructed of I-beams, with cable between them, at standoff 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. David Kyd, International Atomic Energy Agency (IAEA) spokesperson has said that most nuclear plants, built during the 1960s and 1970s, were designed to withstand only accidental, glancing impacts from the smaller aircraft used at the time. He said, "If you postulate the risk of a jumbo jet full of fuel, it is clear that their design is not conceived to withstand such an impact." 2] The Rulemaking Petition to upgrade the Design Basis Threat (DBT) regulations to require protection against at least the number and capabilities of the attackers of 9/11. Current DBT regulations require protection against only three attackers on foot, acting as a single team; with weapons no greater than hand-carried weapons plus the possible assistance of one insider. To deal with the limited threat of DBT, the NRC requires a nuclear power plant to be guarded by a total of just five persons. A mere five guards are not adequate to the task of protecting nuclear power plants which are capable of causing hundreds of thousands of casualties and hundreds of billions of dollars of damage to property and the environment. Since none of the details of the NRC's DBT are secret, any potential adversary can learn that the required security arrangements that protect nuclear power plants are grossly inadequate and plan their attacks accordingly. #