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From: "Ruthie Brand-Neice" <ruthie2feathers@yahoo.com>
To: "US Nuclear Regulatory Com ATTN: Rulemakings and Adjudications Staf" <secy@nrc.gov>
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Subject: Protect Americans from a Nuclear Disaster

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January 23, 2005

US Nuclear Regulatory Com ATTN: Rulemakings and Adjudications Staf
 Secretary
 Washington, DC 20555-0001

Dear US Nuclear Regulatory Com ATTN: Rulemakings and Adjudications Staf:

I am writing in support of the Petition for Rulemaking filed by the Committee to Bridge the Gap to the US Nuclear Regulatory Commission for "Upgrading the Design Basis Threat Regulations for Protection Against Terrorist Attacks on Nuclear Reactors" (posted in the Federal Register on November 8, 2004, Volume 69, Number 215).

If a nuclear plant's containment shell and reactor core, or spent fuel pools, are ever breached, a terrible explosion of radioactivity, on a par with the Chernobyl accident, would ensue. Millions of Americans would be placed in harm's way.

I personally was in Mannheim, Germany when Chernobyl (discussed further below) blew and it was not a pleasant experience. First there were the unsettling reports of a cloud of some kind of radiation in the air dispersing across Europe and the uncertainty that went along with that.

Then there was the too-long-in-coming admission of the Russian government that indeed there had been a nuclear explosion and the warning that no one knew how far reaching the effects might be. The information went beyond unsettling to become quite terrifying.

In the end it was determined by the powers that be that we who had been in Germany were safely beyond the fall out zone. However, I know that many of the children born to military families that were in Germany during that time have a high incidence of deformities and mental retardation. I also know that many stationed there at the time are suffering a high number of maladies that have been linked to radiation poisoning now.

I had been reasonably healthy before going to Germany from 1985 - 1988. Shortly after I returned to the US it was discovered I had female cancer and I had to go through surgery and chemo. It has never been back so I am considered a survivor after almost 20 years of remaining cancer-free. It would seem that if this affliction was something that I am pre-disposed to, it would have reared it's ugly head again as it often does for most cancer survivors.

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I also suffer from heart and lung problems now as well as a bone disease. I have been on Social Security disability since about 1990. I worked two jobs most of my life and was healthy. Within 5 years of the Chernobyl experience even though I was supposedly too far away for it to affect, I was unable to work at all..

Unfortunately, America's nuclear plants are highly vulnerable to attack. Fortunately, such a cataclysm is preventable. .

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.

I urgently request that the NRC upgrade the Design Basis Threat (DBT) for US nuclear power stations. The NRC must revise the DBT regulations to require the 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. These would obstruct the angle of an 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.

Please make Americans safer today by upgrading the Design Basis Threat for US nuclear power stations.

Sincerely,

Ruthie Brand-Neice
316-775-3868

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