

**From:** Mark Rubin *NSIR*  
**To:** Glenn Kelly  
**Date:** Friday, June 13, 2003 04:37 PM  
**Subject:** Re:

I'm glad your "goat" is so accomplished. Please have NSIR buy in to the proposed statement of offsite resources and response.

>>> Glenn Kelly 06/13/03 04:32PM >>>

*NSIR  
OKAY*

Information in this record was deleted  
 in accordance with the Freedom of Information  
 Act, exemptions 2  
 FOIA 2004-0226

*H19*

- \* In Section II, Consequences of Event, it is stated that the spent fuel pools and the dry storage casks do not have flammable material that would support a long duration fire. While this is an accurate statement, it appears out of place in the discussion and even so, a terrorist attack could include the use of incendiary devices.
- \* Section III, Common Vulnerabilities, paragraph 1, discusses the DBT for radiological sabotage. One could interpret the writeup to say that a plant or site that meets the DBT will be protected against a 9/11-type attack.

Ex 2

- \* Section III, Common Vulnerabilities, paragraph 4, discusses NUREG-1738, which concluded that the risk from a spent fuel pool zirconium fire at a decommissioning plant is very low. That statement is correct. The NUREG specifically noted that sabotage was not investigated during the development of the report. While there are important insights in the NUREG about the robustness of SFPs, the frequency with which this robustness can be overcome is not addressed in nor can it be extrapolated from the report results. We recommend replacing the 4<sup>th</sup> paragraph with the following:

"In NUREG-1438, NRC concluded that the risk from a spent fuel pool zirconium fire at decommissioning plants from random events (e.g., earthquakes, fires, and tornados) is very low due to the robustness of SFP designs, and that the risk is well below the Commission's safety goals for operating reactors. The study found that the event sequences most important to the zirconium fire risk at decommissioning plants are large (catastrophic) earthquakes and spent fuel cask drop events. The study did not address sabotage, but did demonstrate the robustness of SFPs."