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PROPOSED RULEMAKING 73
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From: <Arnoldgore@aol.com>
To: <secy@nrc.gov>
Date: Mon, Jan 16, 2006 9:42 PM
Subject: Comments on Rulemaking RIN 3150-AH60

Re: RIN 3160-AH60

The proposed Rulemaking on the Design Basis Threat (DBT) dealing with the essential security levels protecting Nuclear Power Plants do not deal with the clear Congressional Mandate to make sure the vulnerable Nuclear Plants plan to protect against the probability that terrorists will focus their attention on these plants. The Presidential Commission Investigating the September 11,2001 attacks found that original plan focused in part on 2 planes aiming to crash into nuclear plants. Fortunately this was scaled back. It surely does not mean future planning can ignore the threat. The Proposal of the Committee to Bridge the Gap tried to address this problem. Our reliance on these obvious targets for terrorists should not continue to present obvious targets to our adversaries. See the July 23, 2004 CBG Petition for Rulemaking and the January 24, 2005 NIRS comments in support of the rulemaking NIRS as well as the January 24, 2005 combined comments of the Offices of Attorneys General in support of the CBG rulemaking at [_http://www.nirs.org/reactorwatch/security/securityhome.htm_](http://www.nirs.org/reactorwatch/security/securityhome.htm)

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USNRC

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OFFICE OF SECRETARY
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On November 7, 2005, the Nuclear Regulatory Commission (NRC) published in the Federal Register a Proposed Rulemaking (RIN 3150-AH60) to amend its rules

regarding the Design Basis Threat (DBT) governing the required levels of security around U.S. nuclear reactors.

The DBT is basically a document that identifies the potential size, modes and strength of attack by adversary forces intent upon radiological sabotage

using a nuclear power station or other nuclear materials. The DBT is established in order to determine the required level of onsite defenses to reliably

defend against such an attack until local law enforcement, National Guard or

federal forces can be brought to bear. The DBT includes a classified description

of "adversarial characteristics" designating the size of the attacking force and the number of potential insiders supporting the attack, the types of

weapons and explosives they could employ as well as their modes of entry by land and water. Defense against air attack is neither considered nor required by

NRC.

The NRC summary of its Proposed Rulemaking states that it would amend the Commission's regulations to codify security require See the July 23, 2004 CBG Petition for Rulemaking

and the January 24, 2005 NIRS comments in support of the rulemaking NIRS as well as the January 24, 2005 combined comments of the Offices of Attorneys General in support of the CBG rulemaking at

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Under the guise of protecting "safeguards information," the NRC rulemaking itself is a violation of rulemaking laws, in that it provides nothing but

vague generalities that make meaningful and genuine public comments

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impossible. Given the longstanding public concerns regarding NRC and nuclear industry security cost containment strategies, the proposed rule is the dangerous product of behind-closed-door meetings and deal makings that after-the-fact offers the public an opportunity to comment without specifics or basis. This type of business as usual damages public confidence in NRC priorities and the current state of security levels existing at nuclear power stations.

Please give favorable consideration to the Proposal of the CBG above.

Sincerely,
Arnold Gore
Consumers Health Freedom Coalition

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Subject: Comments on Rulemaking RIN 3150-AH60
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From: <Arnoldgore@aol.com>

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