SAPL

Seacoast Anti-Pollution League

Since 1969

Seacoast Anti-Pollution League
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Subject: Comments Nuclear Regulatory Commission Proposed Rule 10 CFR Part 73: Design Basis Threat [RIN 3150-AH60]
Date: January 18, 2006
To: Secy@nrc.gov (301) 415-1966

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The Seacoast Anti-Pollution League supports the comments submitted by Pilgrim Watch (document attached). SAPL also provides its own comments regarding nuclear plant safety/security and the proposed NRC Design Basis Threat Rulemaking proposal.

SAPL's comments and supporting documentation include the following files:

- SAPL Rulemaking Comments (this document)
- Attachment A
- Attachment B-Nuke-Waste
- HomelandInsecurity-Wackenhut
- Seabrook-Boston Herald

On Seabrook Nuclear Plant's "Security"

Seabrook stores its radioactive wastes in an onsite containment pool. Since 1990, the plant has been generating 30 tons of radioactive waste per year, for a total of about 450 tons (!) by 2005. Even if the permanent waste storage facility at Yucca Mountain ever opens, it would likely be full before Seabrook's turn came, as Seabrook was one of the last plants built (it is the 4th youngest). The radioactive waste is there to stay for the foreseeable future, and it is not safely stored, in that it is at risk of terrorist attack, according to this year's National Academy of Sciences study ("Safety and Security of Spent Nuclear Fuel Storage: Public Report, 2005,125pp. NAS report online: http://www.nap.edu/books/0309096472/html/). According to the *Washington Post* (April 7, 2005), the NAS said "the government has failed to address the risk that a passenger plane flying at high speed could be deliberately crashed into a commercial nuclear plant, setting off fires and dispersing large amounts of radiation" and recommended moving the waste to dry cask storage where it would be less vulnerable to attack. (See Attachment B for articles on radioactive waste storage.) Clearly

such an attack could be catastrophic, as a fire in the containment pool would lead to an explosion that could take out most of New England and the Canadian Maritimes, depending on the winds, for centuries.

In spite of warnings by watchdog groups and experts, and in the face of the NAS report on the risks of terrorist attack, Seabrook has this year displayed an incredible laxity in plant security. After bragging about its $14 million of required post-9/11 security upgrades in Dec. 2004, calling them "Defense in Depth" and naming the security fence "the great wall of Seabrook," within three months the plant was being investigated for serious security failures and violations of security procedures. The intruder-detection system was "inoperable" (according to the NRC) for months, and included broken security fences and malfunctioning surveillance cameras, and the resultant (illegal) overtime work by security guards to compensate for the non-functional system. The complete lack of experience and technical knowledge of the Security Manager at the plant, who is not a security professional, is cited in an internal Seabrook Condition Report (May 4, 2005) as a "contributing cause" of these security deficiencies. (See Rep. Ed Markey's web site at this link http://www.house.gov/markey/nucreactorsec.htm for detailed information on these lapses and the investigation, and see Attachment A for newspaper articles on the Seabrook security failures.) Seabrook spokesman David Barr noted that the security fence ends with the marsh, which he calls a "natural barrier." That kind of assumption is a grave and foolish mistake, as General Montcalm of New France found out in 1759 when he depended on a "natural barrier" that didn't prevent the English under General Wolfe from pouring over the "natural barrier" of the cliffs at Quebec City to defeat him and take Canada. We should not be relying on the laziness or stupidity of attackers!

Seabrook employs Wackenhut Corporation to provide security, a firm known for retaliating against whistleblowers, creating a chilled work climate, working its guards overtime, providing insufficient training, cheating on security drills, falsifying drug screening, and allowing visitors in protected areas unattended. Wackenhut may be responsible for some of Seabrook's security problems. (See the attached study, "Homeland Insecurity.")

Seabrook nuclear plant affects the health and safety of a large population. Four counties are less than 30 miles from Seabrook: Essex County, MA to the south, Rockingham and Strafford Counties, NH to the north and northwest, and York County, ME to the northeast. About 1.35 million people live in this area, and just over half live in the Massachusetts portion. Population in the region has only grown by about 1% a year since 1990. Greater Boston only 40 miles away has a population of 3.8 million. Seabrook plant makes a wonderful target for

terrorists, and mishaps at the plant, or terrorist attacks, or the constant emissions of low-level radiation present a constant threat to the environment and to public health and safety.

Responses to Security Infractions at Seabrook

State Response:
The Science, Technology, & Energy Committee, and the State of New Hampshire generally, appear willing to trust the owners of Seabrook to know what's best for the public.

Local Response: Nil. There has also been a pronounced lack of local focus on potential dangers and preparedness. Local officials are inadequately prepared, to say the least, for an emergency. An emergency might not oblige by happening in the winter, but might well occur during the tourist season. If it did, local officials have no clue how they would evacuate 1/2 million people from the Hampton Beach region on two-lane roads that are severely congested during tourist season.

When local officials were informed that three months after the $14 million security makeover, the security fence and surveillance cameras were "inoperable" and plant security guards forced to work overtime (illegally) to compensate, they reacted as follows:

Seabrook town officials expressed no real alarm at the alleged lack of security at the plant.

"It really didn't cause me any concern," said Fire Chief Jeff Brown. "I expect they're professionals at what they do."

"I just feel the agencies responsible will take care of this," said Selectwoman Cora Stockbridge. "I have faith they will take care of it."

Town Manager Fred Welch said on Wednesday he had not been in contact with plant officials concerning the alleged security breach.

[In Attachment A, see: Susan Morse, "Reps: Seabrook security fence useless," *Exeter News-Letter*, April 27, 2005, or go to http://www.seacoastonline.com/news/exeter/05272005/news/44555.htm]

Federal Response **(Mass.)**: Three US Congressmen from Massachusetts, in particular Rep. Ed Markey (MA-7), but also Reps. John Tierney (MA-6) and Martin Meehan (MA-5), have been assiduously following public health and safety issues with regard to Seabrook Station. See Rep. Markey's web site at these links for a full accounting of his activities in trying to publicize, investigate, and correct security and

safety problems, and threats to public health, at this nuclear facility (and others):
http://www.house.gov/markey/nucreactorsec.htm
http://www.house.gov/markey/nucwaste.htm

Attachment A also contains copies of newspaper articles and press releases with information on the Seabrook security breaches.

***Federal Response* (NH)**: Nil. Rep. Jeb Bradley (NH-1), whose district includes Seabrook and all of Seacoast New Hampshire, has full confidence in whatever the plant or the NRC tell him about security, safety, and public health. He is sure the plant does a great job. Two weeks after multiple revelations of serious security failures, Rep. Bradley announced that "security there is very tight" and has been "heightened significantly since 9/11." (If that were true, the state of security at Seabrook before 9/11 would have been unimaginably pitiful.)
For his comments on the security failures at Seabrook in April and May 2005, see this article in Attachment A (into which all articles mentioned are copied):
Rep. Bradley confident that Seabrook nuclear plant is safe
By Terry Date
June 9, 2005
http://www.fosters.com/apps/pbcs.dll/article?AID=/20050609/NEWS07/106090082&SearchID=73210755531506
(linking to this article requires registration at Fosters.com)

Respectfully submitted,

Herbert Moyer

SAPL President

ATTACHMENT A: COLLECTION ON SEABROOK SECURITY

SEABROOK SECURITY

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DEFICIENT SEABROOK SECURITY REVEALED AFTER 9/11
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Markey warns of nuke terror: Plant security faulted

by Andrew Miga
Boston Herald, Monday, March 25, 2002

WASHINGTON - The nation's nuclear plants fail to screen workers for terrorist ties, making the facilities vulnerable to deadly attacks, U.S. Rep. Edward J. Markey (D-Malden) charged in a scathing report released today.

Warning of ``troubling black holes in homeland security,'' Markey said al-Qaeda or other terrorist operatives could be secretly working in some of the country's 86 most sensitive nuke facilities, waiting to strike.

``Terrorists may now be employed at nuclear reactors in the United States just as terrorists enrolled in flight schools in the U.S.,'' Markey said in his report: ``Security Gap: A Hard Look at Soft Spots in Our Civilian Nuclear Reactor Security.''

More than six months after the Sept. 11 airliner suicide strikes, Markey warned that the Nuclear Regulatory Commission has fallen far short in its security crackdown. NRC officials were not available for immediate comment last night.

``The NRC is in the dark about what nuclear reactor licensees are doing to ensure the reactors are safe from attack,'' said the congressman.

Markey, who has led the fight in Congress for nuclear plant safety, queried the NRC about its response to terrorism in a series of letters since Sept. 11.

``There is little comfort to be found in the agency's response to my questions,'' wrote Markey. ``Black hole after black hole is described and left unaddressed.''

The NRC does not require adequate background checks for nuclear plant employees to check potential terrorist ties, Markey alleged.

``As long as they have no criminal record in this country, al-Qaeda operatives are not required to pass any security check intended to find and expose terrorist links,'' Markey said.

But the Nuclear Energy Institute, an industry group, says every person who applies for a job at any of the nation's nuclear power plants undergoes extensive criminal, psychological and employment history checks.

Crimes committed overseas by foreign job applicants are not even looked for by plant officials, Markey said, citing NRC data.

Further, the NRC does not monitor plant security spending and how many security guards are on duty at each plant, Markey charged.

The NRC is currently doing a comprehensive review of nuclear plant security, agency officials have said.

``Post 9/11, a nuclear safety agency (that) does not know - and seems little interested in finding out - the nationality of nuclear reactor workers . . . is not doing its job."

Markey compared the lax security screening at nuke plants to the ease with which al-Qaeda operatives obtained student visas for flight schools.

``Al-Qaeda operatives such as Mohammed Atta or Marwan al-shehi could pass the narrow nature of the criminal screening still in use at U.S. nuclear plants and gain unescorted access to the controlled area of the plant, just as they obtained student visas to attend flight school," said Markey.

Markey has been a leading proponent of federalizing nuclear plant safety, warning that permitting a patchwork of differing plant security measures only invites disaster.

``The threat is no longer theoretical," the veteran congressman said.

National Guard troops were deployed at many plants across the country in the wake of Sept. 11, including the Pilgrim facility in Plymouth.

Some local officials are calling for anti-aircraft missile batteries to protect Pilgrim.

The NRC has resisted placing anti-aircraft weapons at plants, despite the proximity of many reactors, including Pilgrim, to airports, Markey noted. France and Hungary have deployed anti-aircraft protection for some plants.

Markey's report also found that 96 percent of all reactor plants ``were designed without regard for the potential impact from even a small aircraft."

Concerns about the security of spent nuclear fuels stored at many plants, including Pilgrim, were also raised.

The NRC acknowledged earlier this month that 18 facilities across the country store spent nuclear fuel rods in outside vertical rows. While the so-called casks pose little danger, they are easier targets than reactor buildings.

Nuclear plants fail security exercises about half of the time, Markey noted, adding that President Bush has cited al-Qaeda documents found in Afghanistan that diagram civilian nuclear sites in America.

http://www.nci.org/02/03f/25-09.htm

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NEW SEABROOK SECURITY SYSTEM PROUDLY UNVEILED, DEC. 2004

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N-plant shows off 'Defense in Depth'
By Susan Morse
smorse@seacoastonline.com
DEC. 12, 2004

SEABROOK - Seabrook Station unveiled $14 million in security upgrades on Wednesday, in the first media tour of the nuclear power plant since the week after the terrorists attacks of Sept. 11, 2001.

"In the days prior to Sept. 11, it was no problem getting groups in here," said spokesman David Barr.

The upgrades were mandated by the Nuclear Regulatory Commission in 2003, with a completion date of this Oct. 29. The NRC required enhancements to the physical structure, training and employee qualifications and a contingency plan, leaving the implementation up to the individual plants.

The $14 million for the new security measures was paid by Seabrook's owners, FPL Energy Seabrook Station, part of FPL Group, which also includes the subsidiary, Florida Power & Light.

In a tour of the grounds, Barr showed the new security systems called "Defense in Depth," layers designed to restrict access to the protected area.

A vehicle barrier system, a continuous line of double jersey barricades filled with stone, has been set up to prevent vehicles loaded with explosives from getting close to the plant.

Where a parking lot used to be located in front of the main entrance, is now a grassy mall. The plant built a new parking lot for employees beyond the jersey barriers.

The barrier can withstand the force of a fully-loaded dump truck, said Barr, calling it, "the great wall of Seabrook."

A new vehicle trap has been set up for drivers who need to get onto the protected area. The vehicles are stopped between steel bars and are searched.

A second new, inner security fence lines the protected area. The fence ends at the marsh, which is "a natural barrier," said Barr.

Elevated guard towers have been added to the perimeter.

The focus of the security measures is the nuclear reactor, an 180-foot high dome made of 6 feet of steel reinforced concrete. There are two domes, said Barr, nestled like cups, with 5 feet of air space in between. The actual nuclear fission process takes place underground, in the reactor vessel.

Fission produces heat to create steam. On the non-nuclear side of the plant, the steam turns turbines which produce electricity.

The radiation released from the process is less than two ten-thousandths of 1 percent a year, said Barr, much less than the 3 percent released from a TV set.

A second reactor never went online. Last year Seabrook's owners removed the rusted dome and replaced it with a new cover. The space between Unit 1 and Unit 2 is the "50-yard line," said Barr.

Barr said he could not identify where the spent fuel rods are stored. The waste is supposed to go to the Yucca Mountain storage facility in Nevada. With that plan in litigation, nuclear power plants have been forced to store spent fuel rods in dry storage on site. By 2009, Seabrook's space will also be full and dry storage will be needed, said Griffith.

On a daily basis - in a security measure that has been in place since Seabrook went online - workers pass through an explosive detector, a metal detector and an X-ray machine.

Then they go through a hand geometry sensor, which identifies them before being allowed through the turnstile gate.

To get a badge, workers must pass a psychological assessment, get an in-depth background check going back three years, an education check, and alcohol and chemical screening tests.

The force of over 100 security guards is employed by national contractor Wackenhut. Wackenhut and the nuclear industry has come under fire by nuclear watchdog groups for overtime worked by security guards and turnover of employees.

When asked, Barr indicated he didn't know the amount of security turnover at Seabrook Station.

"I'd be making it up," he said.

The NRC recently mandated restrictions on the amount of time security can work.

"One of the things we clearly monitor is the work hours," said Security Manager John Giarrusso. "The last thing we want to do to is burn out anyone."

Seabrook employs more than 600 people, said Griffith, and hires more temporary workers for maintenance during power outages for refueling.

Seabrook Station has been operating since 1986. In that time, it has declared nine unusual events - three of them weather-related. The classification is the lowest declared emergency at a nuclear power plant. Seabrook has never declared any higher emergency classification.

http://www.seacoastonline.com/2004news/hampton/12242004/news/55713.htm

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ARTICLES/EDITORIAL/CONGRESSIONAL PRESS RELEASES -- AFTER ALLEGEDLY UPGRADING SECURITY, MULTIPLE SEABROOK SECURITY FAILURES REVEALED, APRIL-JUNE 2005 (listed chronologically)
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Reps: Seabrook security fence useless
Exeter News-Letter, April 27, 2005
By Susan Morse
smorse@seacoastonline.com
http://www.seacoastonline.com/news/exeter/05272005/news/44555.htm

SEABROOK - Two Massachusetts members of Congress have written a letter to federal regulators about alleged security problems and overtime violations at the Seabrook Station nuclear-power plant.

The congressmen's actions come days after it was learned a security fence intended to prevent outside threats to Seabrook Station failed a recent Nuclear Regulatory Commission inspection and was declared inoperable.

Democrats Edward Markey and John Tierney asked the Nuclear Regulatory Commission numerous questions about claims that an intruder detection system wasn't installed correctly and did not work, and that the plant forced security guards to work overtime to compensate.

"If these allegations are true, they represent a significant homeland security lapse at the Seabrook nuclear power plant, which the licensee appears to be compensating for by creating an overworked, overtired and consequently less effective security guard force," Markey and Tierney wrote in a letter to NRC Chairman Nils Diaz.

On Tuesday, it was reported in The Hampton Union and the Portsmouth Herald that, based on an internal Seabrook Station document, the NRC had indeed found flaws in the intruder-detection system and declared it "inoperable."

Plant spokesman Alan Griffith said federal law prohibits him from discussing safety issues, but he said "at no time has Seabrook ever been in a position that it can't protect public health and safety." He added that the plant's safety systems "are multilayered and not isolated to any one system."

He admitted, however, that a component of the security system "was not operating the way we wanted it to" during a test.

The security fence was installed by a subcontracted engineering firm on Oct. 29, 2004. The requirement to upgrade Seabrook Station's fence came from NRC mandates stemming from the Sept. 11, 2001, terrorist attacks on New York and Washington, D.C.

In response to the failure of the security component, Seabrook Station launched an investigation. Officials identified two basic causes of the failure, according to the internal documents.

The first was the "the Perimeter Intrusion Detection System design was inadequate," and the second was that "the system testing performed to commission the system, and subsequent tests to ensure operability, were deficient, which resulted in failure to identify the inadequate design," the documents indicated.

The report found two other factors that contributed to the system's failure. The first was that Seabrook Station's primary owner, Florida Power, Light and Energy's, review and approval of the system vendor, Proto-Power, "lacked vigor." The other contributing factor was that the nuclear plant suffered from "inadequate security organizational effectiveness," the report indicated.

As for Markey's concerns about overtime violations, Griffith called the allegation "completely erroneous. We have no idea where Markey is getting this."

Markey received the information from a Seabrook employee, according to the letter.

Sandra Gavutis, executive director of nuclear watchdog group C-10 in Newburyport, said the organization has heard about "a lot of burnout and discontent among the guards" from whistleblowers.

She said the public is given little information from the plant, particularly since the events of Sept. 11, 2001.

"Since 9/11, when information like this comes to the public, it just makes us that more skeptical," she said. "It's a breach in the trust of the plant. They keep saying, 'be assured, we're as concerned about safety as you are.' This didn't come from the plant, it came from a whistleblower.

"It's a real lapse of security, there should be real concerns," said Gavutis, "the installer, the NRC, the utility have fallen short in protecting our safety."

Tierney represents Newburyport, where C-10 is located.

Gavutis said whistleblowers who come to C-10 are referred to either Markey or Tierney.

NRC spokesman Neil Sheehan said the agency does not comment on security matters.

"If there is a security issue that is raised with us, we will certainly take a close look at it and respond accordingly," he said.

Seabrook Station unveiled the $14 million in security upgrades, including the intruder-detection system, last fall. The upgrades were mandated by the Nuclear Regulatory Commission in 2003, with a completion date of this Oct. 29.

The NRC required enhancements to the physical structure, training and employee qualifications and a contingency plan, leaving the implementation up to the individual plants.

The $14 million for the new security measures was paid by Seabrook's owners, FPL Energy Seabrook Station, part of FPL Group, which also includes the subsidiary, Florida Power & Light.

Seabrook town officials expressed no real alarm at the alleged lack of security at the plant.

"It really didn't cause me any concern," said Fire Chief Jeff Brown. "I expect they're professionals at what they do."

"I just feel the agencies responsible will take care of this," said Selectwoman Cora Stockbridge. "I have faith they will take care of it."

Town Manager Fred Welch said on Wednesday he had not been in contact with plant officials concerning the alleged security breach.

Information from The Associated Press was used in this story.

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Public has right to know about failed Seabrook Station fence
Editorial -- Sunday Herald
May 29, 2005

The idea that the security fence surrounding the Seabrook Station nuclear power plant has not been operating since it was installed late last year is frightening enough. But what is more frightening - and perhaps even more dangerous - is the ability of plant personnel and owners to hide behind the laws enacted since Sept. 11, 2001, in order to keep their failures quiet.

The Nuclear Regulatory Commission used to put incident reports on its Web site. It was a way for the public to know just how safe their local power plants are.

However, in the paranoia that has gripped this country since 9/11/01, this - as well as other types of information formerly accessible to the public - is no longer available.

The fact is neither we, nor you the reader, would have known about the nuclear plant's failure to adequately install or test one of the primary safeguards against a terrorist attack had it not been for the willingness of someone inside the plant, who was fed up with how security was being mismanaged, to come forward.

This employee took a risk. It showed courage and more concern for the community surrounding the nuclear plant than was evident from the plant's management, which failed to do the things necessary to find out if this perimeter intrusion fence was working properly.

It makes one wonder just what else is going wrong inside our nuclear plants, chemical-production facilities, ports and airports that we citizens will never be able to find out about - and, therefore, never be able to exert the pressure necessary to change them - because that information is deemed too sensitive to be released.

In fact, when we asked a Seabrook Station official to confirm the fence failure, he said he could not because he would be in violation of federal law. He also warned that sharing this important information with our readers could bring federal fines and punishments.

We decided to write the story because we believe our readers, almost all of whom live within the 10-mile evacuation zone surrounding Seabrook Station, need to know the failure of a primary security system had gone undetected for nearly eight months. We also factored in information from Seabrook officials that they had immediately embarked on correcting the problem and there are sufficient redundant systems in place to keep the plant and the public safe.

But we were told at least one other news organization had information about the fence failure and decided not to release it to the public. We can only assume it was because of the threat of federal reprisals.

There is certainly a concern that reporting on security failures at potential terrorist targets could make that information known to those willing to take advantage of those soft spots in order to wreak havoc on our country and our citizens. However, in many cases the option is to simply take the word of those with vested interests in portraying an aura of security when none actually exists, as the Seabrook Station event shows.

One of the roles of the media is to be the watchdog that barks at night, and tells everyone in the house something is wrong - especially if the back gate is open. Increasingly, there is a desire of policymakers, especially the current majority party in power, to muzzle the dog. Federal policymakers would like less public oversight, but more knowledge of your most intimate details. A free press is a vital part of our system of checks and balances, and was very much envisioned by our founding fathers.

The Seabrook Station incident shows how these issues play out right here in our back yard. We are best as a community, and as a nation, when we allow openness and public scrutiny of homeland security, when we insist on transparency as to what our government "of the people" has done lately - or has not done - to protect us.
-Herald Sunday
http://www.seacoastonline.com/news/05292005/editoria/44928.htm

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Congressmen claim more Seabrook security problems
June 1, 2005
http://www.boston.com/news/local/new_hampshire/articles/2005/06/01/congressmen_claim_more_seabrook_security_problems/

CONCORD, N.H. --Two Massachusetts congressmen again are questioning alleged security problems at New Hampshire's Seabrook nuclear plant.

Democrats Edward Markey and John Tierney said Wednesday in a second letter to the Nuclear Regulatory Commission that the agency "take immediate action to protect public safety."

Last week, Tierney and Markey said an intruder detection system wasn't installed correctly and did not work and the plant forced security guards to work overtime to compensate.

On Wednesday, they said additional safety issues were raised by a Seabrook employee regarding defective security cameras and the plant's failure to conduct a security analysis.

"Last week I learned that the security fence at Seabrook has been broken for months," Markey said.

"Now it turns out that this is just the tip of the iceberg. The fence is broken, the security cameras don't work, and some required security analysis hasn't even been performed. It seems the plant motto is 'see no evil, hear no evil, maybe no evil exists.'"

Plant spokesman Alan Griffith said federal law prohibits him from discussing security matters, but he said that "our safety system is vast, multilayered, not dependent on any one system. Public health or safety has never been compromised."

NRC spokesman Neil Sheehan said the agency does not comment on safety issues.
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Congressmen Claim More Seabrook Security Problems
Markey, Tierney Say Security Cameras Don't Work
http://www.thewmurchannel.com/news/4559775/detail.html?rss=man&psp=news

POSTED: 10:41 am EDT June 2, 2005
UPDATED: 5:45 pm EDT June 2, 2005
CONCORD, N.H. -- Two Massachusetts congressmen are again questioning alleged security problems at New Hampshire's Seabrook nuclear plant.
eo
[Photo was here]
Nuclear Plant Officials Say Facility Is Safe

Democrats Edward Markey and John Tierney said Wednesday in a second letter to the Nuclear Regulatory Commission that the agency should "take immediate action to protect public safety."

Last week, Tierney and Markey said an intruder detection system wasn't installed correctly and did not work and the plant forced security guards to work overtime to compensate.

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NRC spokesman Neil Sheehan said the agency does not comment on safety issues.

Seabrook is located on New Hampshire's seacoast, a few miles from the Massachusetts border and about 40 miles north of Boston.

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Meehan: Seabrook security 'troubling'
By MATT MURPHY
Lowell Sun, June 6, 2005
http://www.lowellsun.com/local/ci_2780511

SEABROOK, N.H. -- After visiting the Seabrook Nuclear Power Plant yesterday afternoon, U.S. Rep. Marty Meehan said several breakdowns in the plant's security system should be cause for deep concern.

The Lowell Democrat toured the facility privately with plant officials and members of the federal Nuclear Regulatory Commission in light of recent reports that the NRC had inspected the plant's security fencing and intruder-alert system and found it to be improperly installed.

U.S. Reps John Tierney and Edward Markey, also of Massachusetts, have both written letters to the NRC decrying the breakdown in security. Meehan said it was his duty as a congressman in keeping with the findings of the 9/11 Commission that he vigilantly monitor issues of national security.

"I find it deeply troubling that the security fencing that stops potential terrorists from sneaking up to the plant isn't properly functioning," Meehan said. "We've learned that for months the plant has had defective security fences and cameras. We have a failure on the part of the plant to conduct the necessary security inspections."

Plant officials have stated publicly that while the fence was not functioning properly, it in no way compromised the security of the plant or the safety of nearby residents.

Meehan said the use of guards to protect the plant's perimeter is necessary but not an adequate substitute for modern technological security systems.

"I do think it's important that the NRC conduct a full investigation and require that the problems and the questions raised get fixed immediately. I'm confident that they intend to do that," Meehan said.

After discussing the situation for more than an hour with plant officials and members of the NRC, Meehan said he is confident the security lapses will be addressed immediately, but cautioned that they should not be taken lightly in the post-Sept. 11 world.

The NRC plans to send a special inspection team to Seabrook tomorrow, and Meehan said he would follow up later in the week.

Matt Murphy's e-mail address is mmurphy@lowellsun.com .

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Meehan Investigates Additional Seabrook Security Concerns :

Internal Reports Say Security Guards Overworked, Security Chief Underqualified
June 7, 2005
http://www.house.gov/apps/list/press/ma05_meehan/NR050607Seabrook.html

LOWELL, MA -- Representative Marty Meehan (D-MA), a senior member of the House Armed Services Committee and ranking Democrat on the Terrorism Subcommittee, today released a letter he sent to the Nuclear Regulatory Commission (NRC), along with Representatives Edward Markey (D-MA) and John Tierney (D-MA), regarding serious security problems at the Seabrook nuclear power plant.

"In this age of terrorist threats, it is inexcusable for a nuclear power plant to have so many holes in its security defenses," said Rep. Meehan. "With millions of Massachusetts and New Hampshire residents living in close proximity to the Seabrook reactor there is no room for complacency or error. It is frightening that Seabrook's own condition report last month found its security operations inadequate, yet the plant management refuses to acknowledge a problem. The Nuclear Regulatory Commission needs to take immediate action to rectify this situation."

"Two weeks ago we learned that the security fence at Seabrook has been broken for months," said Rep. Markey. "Last week additional physical security problems were disclosed. This week it turns out that the reactor spokesperson who dismissed my earlier concerns wasn't telling the truth, and the head of security at Seabrook doesn't have ANY security experience whatsoever. Not only does the security problem at Seabrook seem more serious with each passing week, but now it appears the reactor's owner isn't being straight with the public."

"While we are pleased to hear that the NRC has launched an investigation, it must be thorough enough to adequately address the serious issues we have raised. We will continue to press the NRC to immediately address our security concerns," said Rep. Tierney.

The congressmen's letter highlights recent internal Seabrook documents that "do not inspire confidence that Seabrook has 'never been in a position that it can't protect public health and safety,'" as the plant has asserted. The letter concludes that "the discrepancies between the Seabrook spokesman's statements and the documentation we have obtained leads us not only to continue to have a high level of concern regarding the security posture at Seabrook, but in addition, to question whether statements made on behalf of the reactor licensee have any basis in reality."

The letter refers to two documents, both internal Condition Reports ,issued by Seabrook on May 4 and May 17, 2005.

The May 4, 2005 Condition Report states that the "Newly Appointed Security Manager has no security background experience, lack of technical expertise will preclude this individual from providing appropriate direction and oversight to restore internal & external confidence in Security organization." The document goes on to state that "Selection of a security manager with no experience shows a lack of understanding on a station and/or corporate level of what is required to make the security organization healthy and successful." The document also noted that the "lack of security manager technical knowledge" had been cited in other internal

security reports as "a contributing cause to failure to ensure all aspects of the security order were met."

The May 17, 2005 Condition Report states that "Two Security Officers on Backshift exceeded the Individual Work hour limits when they were called in to support potential Compensatory posts." This contradicts Seabrook's spokesman, who told the Associated Press last week that the overtime allegations are "completely erroneous."

These two reports are the latest in a series of incidents undermining confidence in Seabrook's security. Two weeks ago, members of Congress were informed that the security fence at the Seabrook plant has been broken for several months. Last week additional physical security problems were disclosed including malfunctioning surveillance cameras.

The full Condition Reports are available at
www.house.gov/meehan/seabrooksafety.pdf

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Excerpts from the letter to the Nuclear Regulatory Commission:

The Honorable Nils J. Diaz
Chairman
Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD, 20852

Dear Chairman Diaz:

We are writing again regarding security at the Seabrook nuclear power plant. While we are pleased that you have announced your intention to send a special inspection team to assess security at the plant, we are concerned that the owners of the reactor are distorting the facts associated with its security posture.

We are now in possession of several documents indicating that security officers have in fact exceeded their work hour limits. For example, a May 17, 2005 Condition Report states that "Two Security Officers on Backshift exceeded the Individual Work hour limits when they were called in to support potential Compensatory posts." Other reports also indicate similar incidents involving overworked security guard forces.

These Condition Reports do not inspire confidence that Seabrook has 'never been in a position that it can't protect public health and safety,' as Mr. Griffith asserted. The discrepancies between the Seabrook spokesman's statements and the documentation we have obtained leads us not only to continue to have a high level of concern regarding the security posture at Seabrook, but in addition, to question whether statements made on behalf of the reactor licensee have any basis in reality. Consequently, we ask for your prompt assistance in responding to the following questions:

1) Please provide copies of all of Seabrook's "Condition Reports" related to security with discovery dates between September 11, 2001 and the present.

2) In light of the Condition Reports cited in this letter, do you believe Mr. Griffith's statements to the Associated Press to be accurate? Why or why not? Would you agree that such statements, when viewed alongside the documents obtained by our offices, serve to further undermine public confidence in the ability and commitment of the reactor owner to both maintain security standards at the reactor as well as to communicate honestly with members of the surrounding communities?

3) Please provide a detailed plan and timeline for the Commission's recently-announced plans to send a special inspection team to look into these matters. We also ask that you provide us with regular written updates, including copies of all status reports and relevant correspondence, as the work of this inspection team progresses.

Sincerely,

Edward J. Markey

Martin T. Meehan

John F. Tierney

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Another congressman joins Seabrook Station security issue
By TERRY DATE
Wednesday, June 8, 2005
tdate@fosters.com
http://www.fosters.com/apps/pbcs.dll/article?AID=/20050608/NEWS07/106080059/-1/NEWS24

SEABROOK—A third Massachusetts congressman has joined his counterparts in calling for immediate action to address Seabrook Station security issues that include overworked guards and the head of security having no experience in that field.

The Democratic congressmen, Edward Markey, John Tierney, and now Martin Meehan — the ranking Democrat on the Terrorism Subcommittee — have released a letter written Tuesday to the Nuclear Regulatory Commission chairman that refers to documents that they say reinforce their claims.

At the same time they say the documents, which are condition reports, appear to show the plant spokesman is distorting the facts about Seabrook Station security.

"Not only does the security problem at Seabrook seem more serious with each passing week, but now it appears the reactor's owner isn't being straight with the public,"Markey said.

Meanwhile, plant spokesman Alan Griffith stands by his statements, and says condition reports do not back up the claims of the congressmen. The reports are merely individual concerns written by individual employees, Griffith said this morning, adding there are 15,000 of them filed at Seabrook Station every year on a variety of topics.

A May 4, 2005 condition report on the plant security manager states that he has no background in security, and that a "lack of technical expertise will preclude this individual from providing appropriate direction and oversight to restore internal and external confidence in Security organization."

Griffith responded that security head Wes Bladow is highly qualified for the leadership position, with over 22 years of nuclear experience including oversight. In addition, Griffith said, Bladow is surrounded by security professional with tactical experience.

On the topic of overworked guards, the congressmen have released condition reports indicating officers have exceeded their work hour limits. One example, a May 17, 2005, report states that "Two Security Officers on Backshift exceeded the Individual Work hour limits when they were called in to support potential Compensatory posts."

Congressmen Markey and Tierney had previously written the NRC, late last month, alleging that plant security was being forced to work so many hours to compensate for an inoperable perimeter detection system that they were in violation of the NRC's overtime regulation.

The congressmen also refer to an Associated Press article quoting the plant spokesman as saying the congressmen's overtime allegation was "completely erroneous" and that "we have no idea where Markey is getting this."

Griffith says these condition reports do not prove that there is a widespread problem with forced overtime at Seabrook Station. There are conditions that allow for guards to work overtime, he said.

Representative Meehan, who toured the plant on Saturday and met with plant security, said in a press release Tuesday that it is "frightening" that the plant condition report found security inadequate, yet the plant won't acknowledge a problem.

"In this age of terrorist threats, it is unexcusable for a nuclear power plant to have so many holes in its security defenses," said Meehan. "With millions of Massachusetts and New Hampshire residents living in close proximity to the Seabrook reactor there is no room for complacency or error."

Griffith said he and others heard Meehan tell the public on Saturday that the Seabrook Station is safe. Yet, 48 hours later, the congressmen has done a "180," Griffith said.

Meanwhile, an NRC security team has returned to the plant to review problems found in an inspection last month.

The NRC does not get into security specifics.

Markey and John Tierney, however, have referred to video surveillance camera failings and problems with the plant's perimeter detection system .

NRC spokesman Neil Sheehan said earlier this week that the team wants to delve more deeply into what the agency found in May.

"Since conducting our inspections last month, NRC continued to assure that the company was addressing the inspection findings," states NRC Region I Administrator Samuel Collins, in an NRC press release. "This special inspection will provide us with an in-depth look at the company's efforts to correct any problems and prevent recurrence."

The team, which arrived Monday, is expected to be on site for about a week before returning to the regional office to analyze and evaluate the information. It is checking the plant's short- and long-term actions and plans.

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Rep. Bradley confident that Seabrook nuclear plant is safe
By Terry Date
Jun 9, 2005
http://www.fosters.com/apps/pbcs.dll/article?AID=/20050609/NEWS07/106090082&SearchID=73210755531506

SEABROOK—A New Hampshire congressman weighing in on Seabrook Station security says the nuclear power plant is safe, and he is confident any problems will be corrected.

U.S. Rep. Jeb Bradley's comments follow harsh criticism of plant security by Massachusetts Democratic congressmen. They have recently written the Nuclear Regulatory Commission letters about video surveillance camera failings, problems with the plant's perimeter detection system, overworked guards, and the head of security lacking experience in that field.

Bradley, a Republican, has a much different view than his colleagues to the south.

He said in an interview Wednesday that he has toured Seabrook Station numerous times and has found security "to be extensive and heightened significantly since 9/11."

"The security there is very tight," he said.

Bradley said plant owners, along with federal, state and local agencies, will give proper attention to any issues requiring it.

The congressman bases his confidence on the plant's record of providing energy safely and reliably for many years. In addition, he said he has been assured by NRC Commissioner Jeffrey Merrifield that at no time has there been any problems that threatened the security of the plant.

Meanwhile, New Hampshire's governor awaits the results of an NRC inspection team's findings. The NRC security team has returned to Seabrook Station to review problems found in an inspection last month. The NRC does not get into security specifics.

Gov. John Lynch, through his press secretary, said Bruce Cheney of the state office of emergency management is participating in meetings between the NRC and representatives of FPL, the owner of Seabrook Station. Lynch remains in contact with Cheney, said press secretary Pamela Walsh.

State Sen. Maggie Hassan, D-Exeter, was not immediately available when called for comment.

On Tuesday, Massachusetts congressmen Edward Markey, John Tierney and Martin Meehan released a letter written to the NRC chairman. The congressmen are urging the NRC to take immediate action.

Meehan toured the plant Saturday. In a press release Tuesday, the congressman stated, "In this age of terrorist threats, it is unexcusable for a nuclear power plant to have so many holes in its security defenses."

Plant spokesman Alan Griffith said he and others heard Meehan tell the public on Saturday that Seabrook Station is safe. Yet, 48 hours later, the congressmen has done a "180."

Regrading the NRC inspection, agency spokesman Neil Sheehan said earlier this week that the team wants to delve more deeply into what the agency found in May.

The team, which arrived Monday, is expected to be on site for about a week before returning to the regional office to analyze and evaluate the information.

ATTACHMENT B – DANGERS OF NUCLEAR WASTE STORAGE

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washingtonpost.com
Nuclear Plants Are Still Vulnerable, Panel Says

By Shankar Vedantam
Washington Post Staff Writer
Thursday, April 7, 2005; Page A12

Three and a half years after the Sept. 11, 2001, attacks, the government has failed to address the risk that a passenger plane flying at high speed could be deliberately crashed into a commercial nuclear plant, setting off fires and dispersing large amounts of radiation, a long-awaited report by the National Academy of Sciences has concluded. Officials at the Nuclear Regulatory Commission have maintained that such an attack is improbable and that detailed analyses of the consequences of such attacks are unnecessary. Experts at the nation's premier scientific body said those judgments are flawed.

"There are currently no requirements in place to defend against the kinds of larger-scale, pre-meditated, skillful attacks that were carried out on September 11, 2001," a panel of scientists said, even as it agreed such an attack would be difficult to pull off.

Academy officials battled the government for months to make their declassified conclusions public -- and the version released yesterday charged that federal secrecy edicts designed to keep information from terrorists were paradoxically hurting efforts to defend against such attacks.

Restrictions on sharing information imposed by the NRC had kept the industry from addressing vulnerabilities, the report said.

As a result, government labs and independent researchers have sometimes worked at cross-purposes, searched for solutions that others had already found and duplicated complex analyses.

NRC spokesman Scott Burnell said the agency "respectfully disagrees" that there are no provisions to deal with major attacks.

Security measures have been upgraded since 2001, and the agency continues to analyze risks, he said. But he emphasized that such attacks are improbable and that other agencies are guarding against them. "We do believe that the possibility of a successful attack using commercial aircraft is very small," he said. It is impractical to ask commercial plants to defend against such attacks, Burnell concluded. But he said plants are aware of the risk and are implementing measures to deal with worst-case scenarios.

As to the complaint of excessive secrecy, Burnell said the commission has to implement the law, which requires controls on information that

could be misused. The debate is not over classified information but rather over sensitive data that ought not to be publicized.

In an earlier interview, E. William Colglazier, executive officer of the academy, said the nuclear agency's guidelines for this classification are vague. Even when officials agreed that certain details in the report are not secret, he said, they had argued that chunks of non-secret information, when presented together, constituted "Safeguards Information."

The report said government scientists and independent researchers had conducted analyses of threats without knowing that others were doing the same.

Burnell acknowledged that "the system was not perfect" but said that as more people receive security clearances such bottlenecks could be reduced. The commission has indicated it is seeking to increase access to information.

To the relief of the industry, the academy report disputed a characterization that the commission used in a letter to Congress on March 14. The letter implied that the academy was recommending moving spent nuclear fuel from large pools to dry storage casks. Industry believes that the pools are as safe as the casks and that moving the fuel is not worth the expense.

Louis J. Lanzerotti, chairman of the academy's report, said that his panel had called for analyses of large attacks and that those results might prompt the commission to move fuel to dry storage at some plants. Although dry storage has advantages, the risk of major attacks could be sufficiently addressed by changing how spent fuel is stored in pools and by installing water sprays to control fires, said the academy's Kevin Crowley, the study coordinator.

Storage of Nuclear Spent Fuel Criticized
By Shankar Vedantam
The Washington Post

Monday 28 March 2005
Science academy study points to risk of attack.

A classified report by nuclear experts assembled by the National Academy of Sciences has challenged the decision by federal regulators to allow commercial nuclear facilities to store large quantities of radioactive spent fuel in pools of water. The report concluded that the government does not fully understand the risks that a terrorist attack could pose to the pools and ought to expedite the removal of the fuel to dry storage casks that are more resilient to attack. The Bush administration has long defended the safety of the pools, and the nuclear industry has warned that moving large amounts of fuel to dry storage would be unnecessary and very expensive.

The report was requested by Congress following the terrorist attacks of Sept 11, 2001, as homeland security officials sought to understand the potential

consequences of a 9/11 scale attack on a nuclear facility.

Because it is classified, the contents of the report were not made public when it was delivered to the Nuclear Regulatory Commission (NRC) last summer. Even a stripped-down, declassified version has remained under wraps since November because the commission says it contains sensitive information.

However, the commission itself made excerpts of the report public when Chairman Nils Diaz sent a letter to Congress on March 14 rebutting some of the academy's concerns. His letter also suggested that the academy had largely backed the government's views about the safety of existing fuel storage systems.

E. William Colglazier, executive officer for the academy, said the letter was misleading and warned that the public needs to learn about the report's findings.

"There are substantive disagreements between our committee's views and the NRC," he said in an interview. "If someone only reads the NRC report, they would not get a full picture of what we had to say."

Although the commission said it is keeping the report under wraps for security reasons, some officials who have seen the document suggest that the NRC is merely suppressing embarrassing criticism.

"At the same time that the NRC is saying that the National Academy's study is classified and not releasable to the public, it has somehow managed to send a detailed rebuttal of the report's conclusions to Congress in unclassified form," said Rep. Edward J. Markey (D-Mass.), who has seen the report.

"I am concerned that the totality of the Commission's actions reflect a systemic effort to withhold important information from . . . the public, rather than a genuine effort to be protective of national security," said Markey in a March 21 letter to the Commission's inspector general.

NRC spokesman Eliot Brenner countered that the commission is "a very open agency" and that regulators are working with the academy to make the report public. "Our core concern is making sure that information that could reasonably be expected to be available to a terrorist is not publicly available," he said. "We are continuing to work with them on finding the right balance."

The report was solicited by Congress to study how best to store spent nuclear fuel - tons of rods containing radioactive byproducts of nuclear fission reactions are produced each year by the nation's 103 electricity-generating nuclear reactors. Spent fuel rods generate intense heat and dangerous long-term radiation that must be contained.

Most of the spent rods are currently stored in large swimming pool-like structures called spent fuel pools, said David Lochbaum, a nuclear safety engineer at the science and advocacy group, Union of Concerned Scientists, who has worked at several plants. The pools are about 45 feet deep and 40 feet square and are filled with about 100,000 gallons of circulating water to remove heat and serve as a radiation shield, he said.

After cooling for about five years, the rods can be moved to dry storage - heavy

casks of lead and steel. But the casks are expensive, and commercial reactors have elected to leave the rods in the pools until the polls fill up. Lochbaum said some pools now hold 800-to-1,000 tons of rods. In the event of a terrorist strike, Lochbaum said, the dry casks would be much safer, because explosions could drain the pools and set off fire and radiation hazards.

The nuclear industry wants the fuel moved to a storage site in Nevada, but that project has long been plagued by delays and opposition. Steven Kraft, director of waste management at the Nuclear Energy Institute, an industry group, said studies had shown that the pools are as safe as the dry casks - the same position adopted by the Nuclear Regulatory Commission.

Risk of Attacks Called Slight

Kraft said the risk of catastrophic attacks is minuscule and modeling analyses have shown that even plane crashes are unlikely to affect the integrity of the pools. And even if they did cause damage, he added, there would not be catastrophic consequences because of safety systems already in place.

"If the pool is safe and the casks are safe and they both meet the requirements, there is no justification for going through what is a huge amount of expense and worker exposure" to move the rods to dry storage, he said. In his letter to Congress, commission Chairman Diaz said the academy's recommendation to move fuel to dry storage was based on "scenarios that were unreasonable."

But Arjun Makhijani, a nuclear engineer with the Institute for Energy and Environmental Research, a nonprofit research and advocacy organization that supports underground dry storage of the rods, said the commission had been lax.

"There is no question that any terrorist who wants to know about spent fuel has plenty of information already," he said of the withheld report. "Publication of a report on security will not help terrorists. The only thing it is hindering is discussion of public safety."

Diaz's letter to Congress shows that the academy recommended that the government reevaluate "the vulnerabilities and consequences" to storage pools of "attacks using large aircraft or large explosives." The academy also called for a review and upgrade of security measures to prevent theft of spent fuel rods by insiders and an assessment of security by "an independent organization."

The commission letter defended measures it has already put in place and said "the likelihood an adversary could steal spent fuel . . . is extremely low." The letter said the additional analyses demanded by the academy study was "more than is needed" and rejected the call for an independent security analysis, saying its own assessments were "sound and realistic."

To keep the report secret, the federal agency used a classification called "Safeguards Information" that it applies to data that is unclassified but reveals sensitive details about nuclear facilities and security procedures. Brenner, the spokesman, emphasized that the academy's report and the commission's response had been seen by the Department of Homeland Security and members of Congress charged with oversight: "The full report is there with those with the appropriate clearances."

The academy's Colglazier said the science organization had produced many classified reports but had never encountered such hurdles in creating a public version.

"We don't want to provide information in our report that could be used by terrorists to exploit vulnerabilities," he said. "But we also want the public and decision makers to know what things need to be addressed."

The scientist also rejected Brenner's reassurance that the classified report had been seen by relevant decision makers. Governors of states with nuclear plants need to see the report, he said, and the public had an important role as well.

"The way our political system works, when politicians hear from their constituents, they are motivated to take action that they don't when the public is unaware," he said.

http://www.truthout.org/docs_2005/032805Z.shtml

http://www.washingtonpost.com/wp-dyn/articles/A5408-2005Mar27.html

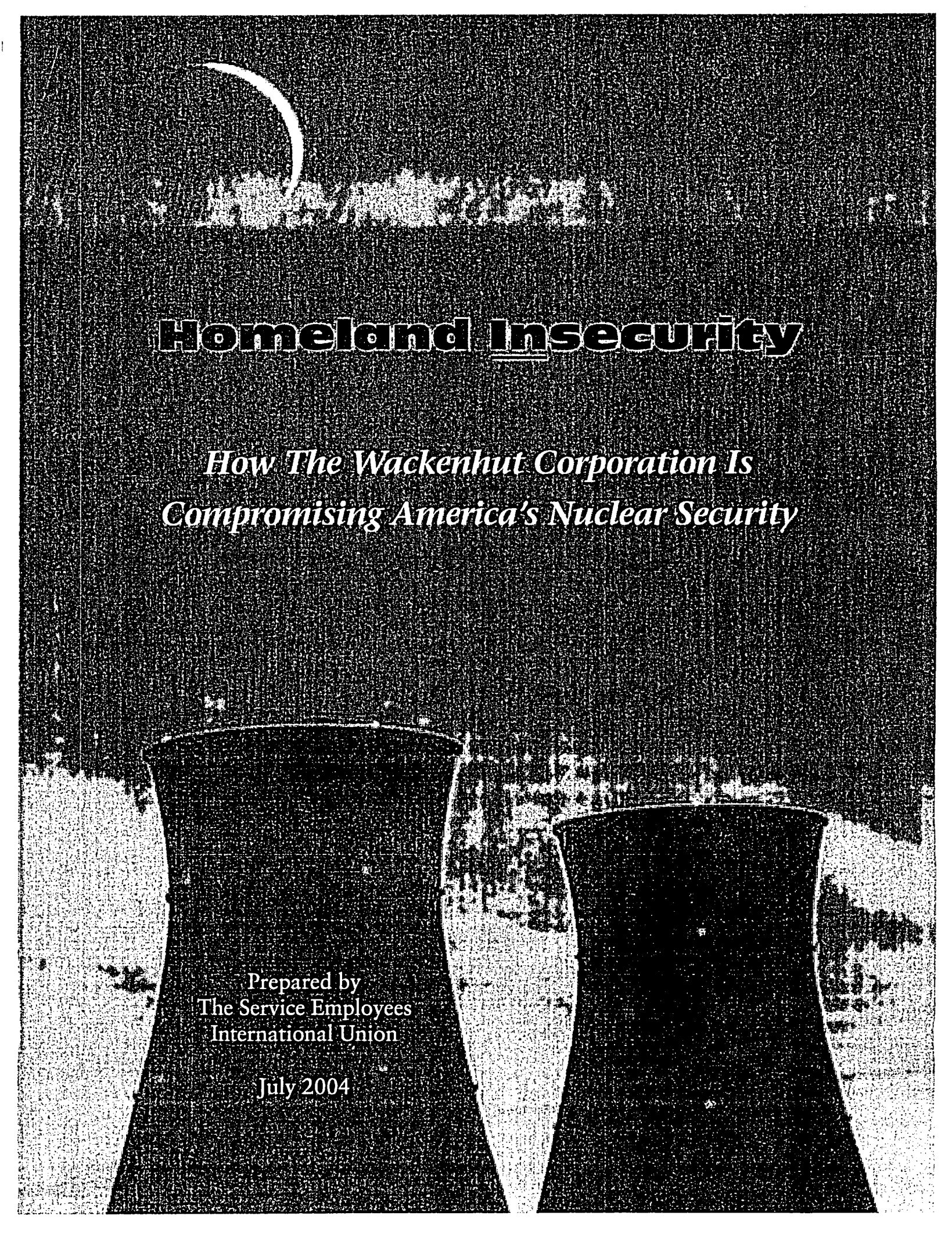
Homeland Insecurity
How The Wackenhut Corporation Is
Compromising America's Nuclear Security
Prepared by
The Service Employees
International Union
July 2004

TABLE OF CONTENTS

Executive Summary

Despite the high level of public concern over homeland security, the single largest supplier of security officers to sensitive U.S. nuclear facilities is a private firm that has overseen frightening security lapses, presided over training cutbacks, and tolerated lax security measures at multiple nuclear sites throughout the United States.

The firm? The Wackenhut Corporation, a subsidiary of the Denmark-based, multi-national private security conglomerate Group 4 Falck A/S.

Wackenhut, the single largest supplier of private contract security officers to U.S. nuclear power plants and nuclear weapons facilities, provides security and other services at thirty nuclear power plants and seven U.S. Department of Energy (DOE) sites, including the U.S. Government's principal nuclear weapons labs.

While many of the individual nuclear security lapses and problems that have occurred under Wackenhut's watch have been reported in the media or made available in public documents, there has not been, to date, a public focus on the fact that what many of these problem sites have in common is that Wackenhut provides their security.

Furthermore, the U.S. Government or nuclear security watchdogs have not conducted or made public a comprehensive investigation to date into Wackenhut's security practices at all its nuclear sites in the U.S.

This report, "*Homeland Insecurity: How The Wackenhut Corporation Is Compromising America's Nuclear Security,*" is the result of the first-ever comprehensive study of public documents, reports, news stories, and court filings related to nuclear security by America's largest union of private security officers, SEIU (Service Employees International Union).

The documents find the Wackenhut Corporation at the center of the swirling controversy over our nation's nuclear security readiness and raise questions about the private firm's fitness to provide adequate security at our nation's most sensitive sites.

The report details how:

Numerous Security Problems Have Occurred at Multiple U.S. Nuclear Facilities Guarded by Wackenhut

Both the U.S. Nuclear Regulatory Commission and the DOE have uncovered problems with Wackenhut's security practices at a number of facilities, including DOE office buildings in Washington, nuclear power plants, and nuclear weapons and related facilities. The agencies have found that:

✔ Wackenhut Cheated on Security Drills

A U.S. Government report made public in January 2004, shows that Wackenhut cheated on security drills at the Y-12 nuclear weapons plant in Oak Ridge, Tennessee. The DOE Inspector General found that Wackenhut personnel had been tipped off in advance during a DOE drill developed to ensure that the site's protective force can respond to potential security threats, such as a terrorist attack. Government investigators concluded that Wackenhut's actions were improper and had tainted the test results to the degree that they could not be relied upon.

✔ Wackenhut Provided Lax Security at the Indian Point Nuclear Power Plant

Wackenhut cut corners on security at the Indian Point #2 nuclear power plant 35 miles from New York City and presented false information to plant management who was conducting a government-ordered investigation into whether employees could freely report safety concerns, according to a report conducted in late 2001 by the plant's owner, the Entergy Corporation.[1] The report's findings included:

- Only one in five Wackenhut security officers felt prepared to defend the plant;
- Physical agility training was "extremely lax;"
- Guards were allowed to take their weapons qualifying exams multiple times so they could pass;
- Allegations of sexual harassment;
- High security officer attrition; and
- Allegations that Wackenhut created a "chilled environment" among employees.

✔ Low Marks for "Force-on-Force" Security Drill

Though Wackenhut boasted about receiving ISO 9002 certification for its operations at the Vermont Yankee Nuclear Power Station, the Nuclear Regulatory Commission gave Vermont Yankee a poor grade on security drills conducted in the weeks just before September 11, 2001. An NRC statement released after the drills said, "The weaknesses were generally predictable, repeatable and indicative of a broad programmatic problem."[2]

✔ Poorly Maintained Weapons Inventories

✔ Wackenhut Inappropriately Stored Explosives and Combustible Material and Inconsistently Tested Protection from Lightning on Explosive Storage Magazines

✔ Wackenhut's Inadequate Control over the Badges Which Grant Access to Top Secret and Restricted National Security Information

✔ Wackenhut Falsified Weapons Tests

✔ Wackenhut Falsified Drug Screening

✔ Four Security Lapses in Four Years at the St. Lucie Nuclear Power Plant in Florida

Wackenhut Guards Removed After Failing to Complete Security Rounds

Wackenhut Failed to Search and Left New Fuel Containers Unattended

Wackenhut Guards Were Improperly Positioned to Detect Intruders

Wackenhut Allowed an Unattended Visitor to Enter Protected Areas

✔ Wackenhut Did Not Pay Proper Attention to Problems with Perimeter Gates

Taken together, these problems reveal an unacceptable level of vulnerability at many of our nation's nuclear facilities and a failure by Wackenhut to properly secure some of our nation's most sensitive sites.

Wackenhut Cut Back on Training at U.S. Nuclear Weapons Labs

A March 2004 report by the U.S. Department of Energy Inspector General found that various DOE sites "had eliminated or modified significant portions of the training while others were not using realistic training delivery methods."[3] Four sites surveyed by the Inspector General contract with Wackenhut for security. Those sites are the Nevada Test Site, the Savannah River Site, the Rocky Flats Environmental Technology Site, and the Y-12 Oak Ridge Site.

At all four of its sites, Wackenhut "eliminated or substantially modified 2 or more blocks of instruction." For example,

- At all four sites Wackenhut did not conduct basic training in the use of shotguns.
- At the Nevada Test Site and Savannah River Site, Wackenhut excluded or modified prescribed training techniques for vehicle assaults.
- At Rocky Flats and Savannah River Wackenhut excluded or modified defensive tactics.
- At none of its sites did Wackenhut include instruction in rappelling even though it was part of the special response team core curriculum.
- At the Nevada Test Site and Oak Ridge Wackenhut modified training in the use of batons.

These disclosures, made public less than two months after the revelations of cheating at the Y-12 site in Oak Ridge, Tennessee, raise even more questions about our nation's nuclear security preparedness and Wackenhut's steps to do what is necessary to ensure an adequate level of readiness.

Wackenhut Forced Guards to Work Excessive Hours

Wackenhut forced security officers at a number of nuclear power plants to work 12-hour shifts for six and seven days straight.[4]

Wackenhut Ignored Security Concerns Raised by Guards at Nuclear Facilities and Illegally Punished the Guards Who Raised Them

For some Wackenhut security officers, voicing their professional opinion has been hazardous to their professional health.

Some Wackenhut officers in the U.S. who have raised questions about security vulnerabilities in nuclear power plants have faced discipline, suspension and even termination.[5] In some of these cases, Wackenhut took no action to fix the problems before they became public.

The concerns raised by guards included:

- Lax perimeter security at the Salem Nuclear Power Plant in New Jersey;[6]
- Negligence in taking inventory of plutonium stores, sloppy emergency drills, and elimination of a bomb-detection unit at the Rocky Flats Environmental Technology Site in Colorado;[7] and
- Shoddy employee screening at the Callaway Nuclear Power Plant in Missouri.[8]

Additionally, the United States Nuclear Regulatory Commission identified three Wackenhut-guarded nuclear power plants, Indian Point, Salem/Hope Creek, and Palisades for in-depth review due to the high number of security-related employee allegations.[9]

U.S. Energy Dept. Considers Federalizing Nuclear Guards

U.S. Secretary of Energy Spencer Abraham announced in May that his agency is considering the possibility of federalizing Department of Energy (DOE) security forces, including those who protect nuclear sites. If implemented, the change could mean Wackenhut will no longer guard U.S. government nuclear weapons facilities, leading to a potential loss in annual revenue of as much as $237 million for the company.

SEIU: Working To Raise Standards in Private Security

As the nation's largest private security officers' union, SEIU (Service Employees International Union) is committed to improving security standards and accountability throughout the U.S. private security industry and is working with security officers across the U.S. to improve training and increase professionalism among the private security workforce. SEIU undertook the research of this report as part of its national program to improve standards in private security.

More than 50,000 private security officers and public safety personnel are members of SEIU.

For more information, go to www.eyeonwackenhut.com

Preface

As the nation's largest union of private security officers, the Service Employees International Union in the United States (SEIU), is committed to improving security standards and accountability throughout the U.S. private security industry. SEIU is working with security officers across the U.S. to improve training and increase professionalism among the private security workforce.

Representing more than 50,000 private security and public safety personnel, SEIU has initiated a national program to work with private security companies and the commercial real estate industry to improve private security by professionalizing and stabilizing the private security workforce, increasing accountability, and creating accredited personnel training programs. These efforts, carried out through collective bargaining, organizing, legislative advocacy, and labor-management partnerships, are currently underway in Chicago, San Francisco, New York, Los Angeles, Boston, Seattle, Minneapolis/St. Paul, and Washington, D.C.

SEIU has successfully advocated to pass new laws in California and Illinois that improve training and industry oversight rules, and SEIU currently is working with Members of Congress to develop federal legislation to improve the background check process for private security officers.

As an international organization dedicated to the highest standards in professional security, SEIU is very concerned about the multiple security problems uncovered at nuclear facilities guarded by Wackenhut, a major actor in the U.S. security industry, and the lack of standards, oversight, and accountability in the private security industry overall.

Introduction

The Wackenhut Corporation is the largest supplier of private contract security officers to America's nuclear power plants and nuclear weapons facilities. Wackenhut claims that it provides "quality services at the highest professional standards."[10] But a comprehensive analysis of public documents, press reports, court filings and surveys of employees paints a different picture—of security officers worked to the point of fatigue, training deficiencies, security lapses, failed procedures, and more disturbingly, retaliation against employees who voice their safety concerns. These problems raise serious questions about Wackenhut's fitness to provide security at our nation's nuclear facilities.

The Palm Beach Gardens, Florida-based Wackenhut Corporation, a subsidiary of the Denmark-based, multi-national private security conglomerate Group 4 Falck A/S, provides security at 30 U.S. nuclear power stations and seven U.S. Department of Energy nuclear sites. [See Appendices B and C for a complete list] Wackenhut provides fully 70 percent of the security services that are contracted out by nuclear power plant operators in the U.S.

Nuclear security and government security business is lucrative for Wackenhut, the second-largest private security company in the United States. According to Wackenhut's financial reports, nuclear power plants and sensitive government contracts accounted for 40 percent of Wackenhut's 2002 consolidated turnover, or more than $434 million.[11]

As this report will show, unregulated private security companies like Wackenhut play a significant role in our nation's homeland defense system. Within this context, the security lapses and problems at nuclear sites guarded by The Wackenhut Corporation are a cause for alarm and deserve a thorough public examination.

Numerous Major Security Problems Have Occurred at Multiple U.S. Nuclear Facilities Guarded by Wackenhut

Both the United States Nuclear Regulatory Commission (NRC) and the Department of Energy (DOE) have uncovered problems with Wackenhut's security practices at a number of facilities, including the Department's headquarters office buildings, nuclear power plants and nuclear weapons and related facilities.

Cheating on Security Drills at the Y-12 Nuclear Weapons Site in Oak Ridge, Tennessee

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"The old adage about 'the more things change, the more they stay the same,' rings true...Indeed, many of the security problems we worked so hard to correct in the 1980s and the 1990s are still plaguing the Department today: site security at some locations remains inadequate...and Wackenhut is still at the center of another controversy."

Honorable John D. Dingell, Ranking Member, U.S. House of Representatives Committee on Energy and Commerce, Subcommittee on Oversight and Investigations closed-door hearing, March 4, 2004[12]

This January, the DOE Inspector General found that Wackenhut personnel had been tipped off in advance during a DOE drill developed to ensure that the site's protective force can respond to potential security threats, such as a terrorist attack. Government investigators concluded that Wackenhut's actions were improper and had tainted the test results to the degree that they could not be relied upon. The DOE report generated widespread negative coverage in the national and local media. A newspaper editorial stated that the findings "should prompt a review of the government's contract with Wackenhut Corp."[13]

DOE Investigators found credible evidence that Wackenhut management had committed or tolerated a range of abuses:

- Wackenhut management told security officers in advance the building and target to be attacked, the exact number of adversaries, and the location where a diversion would occur. This information was reportedly provided about three weeks before the exercise occurred, which allowed the protective force to formulate special plans on how to counter the adversary.
- A protective force responder would be assigned to "tail" the aggressors and observe their movements while they were touring Y-12 buildings and targets prior to and in preparation for an exercise.
- Based on specific attack information, trucks or other obstacles would be staged at advantageous points to be used as barricades and concealment by protective force responders for shooting during the exercises.
- Training prior to a performance test would focus on the specific building to be targeted, and in some instances, an oral plan would be created that deviated from the established Y-12 tactical plan to counter the attack.
- Protective force members had tampered with the Multiple Integrated Laser Engagement System (MILES) gear used to determine whether the officer wearing it could no longer participate in the exercise after receiving a simulated fatal gunshot. Participants had removed the batteries from the MILES gear; put the batteries in backwards and/or placed material such as tape, mud, or Vaseline over the system sensors, so they would not operate properly. New MILES gear purchased at Oak Ridge in 2000, which could have minimized such tampering, was not fully implemented.
- Management would identify the best prepared protective force personnel and then substitute them for lesser prepared personnel who were scheduled to participate in an exercise.
- Officers who would normally relieve other protective force personnel would be armed and held in "stand-by" to participate in an exercise, potentially adding six or seven additional armed responders that would not normally have been available during a shift.

Wackenhut Called to Testify in Front of Congress about Oak Ridge

In early March, the Subcommittee on Oversight and Investigations of the U.S. House of Representatives Committee on Energy and Commerce held a closed-door hearing on security at DOE nuclear facilities. The agenda included testimony by the Senior Vice President/General Manager of Wackenhut Services at Oak Ridge.[14]

Lax Security Practices at the Indian Point Nuclear Power Plant Near New York City

From 1986 until 2003, Wackenhut was responsible for security at the Indian Point #2 Nuclear Power Plant, 35 miles north of New York City. In late 2001, the Entergy Corporation bought the plant and conducted an internal investigation of Wackenhut's performance.[15] The Entergy report found:

- Wackenhut presented false information to plant management who was conducting a government-ordered investigation into whether employees could freely report safety concerns.
- Employee allegations that Wackenhut created a "chilled environment" around the company's administration, personnel, discipline, and general program management. Of those who raised issues to management, only 42% stated that those issues were adequately addressed and 12% believed that Wackenhut retaliated against security officers for raising concerns or making suggestions.
- Substantiated claims of sexual harassment "brought little apparent disciplinary action and certainly did not result in termination." Officers reported that Wackenhut managers ordered them to write their concerns on plain white sheets of paper instead of official Information Reports, a method, Entergy reported, that "can lead to the loss of concerns/complaints and could also be easily abused." When the Entergy investigator sought to review the investigations and discipline records relating to sexual harassment complaints, the Wackenhut manager told him he does not maintain a central log, and that the materials could not be located.
- Only one in five Wackenhut security officers felt prepared to defend the plant;
- Physical agility training was "extremely lax."
- Guards were allowed to take their weapons qualifying exams multiple times so they could pass.
- Security officer attrition was nearly 20%, compared to approximately 1% at the adjacent Indian Point #3 plant, where security was performed by in-house employees.

Wackenhut Loses Contract

In early 2003, following their investigation, Entergy cancelled Wackenhut's contract and took security in-house.

Low Marks for "Force-on-Force" Security Drill

Beginning in 1999, Wackenhut boasted about being the first in the industry to receive ISO 9002 certification for security functions at a nuclear power plant for its operations at the Vermont Yankee Nuclear Power Station. Yet, the Nuclear Regulatory Commission gave Vermont Yankee a poor grade on security drills conducted in the weeks just before September 11, 2001. An NRC statement released after the drills found "potential vulnerabilities in the security program's response strategy." The low grade resulted because "the weaknesses were generally predictable, repeatable and indicative of a broad programmatic problem."[16]

According to the *Associated Press*,[17] in the security drills, "plant security staff underwent 'table-top drills,' were tested for tactical and firearms skills, and were subjected to four mock attacks by small groups of mock terrorists...Deficiencies were found in the 'table-top drills,' and in two of the 'force-on-force' attacks, the invaders were able to reach sensitive areas of the plant—a failure of a sort that has been common in the nuclear industry in recent years."

At the time, the NRC grade given to the Vermont Yankee plant after the drill, was "the lowest mark of any nuclear reactor in the nation undergoing the drill in which the plant has to repel a mock attack," according to the *Associated Press*.[18]

Poorly Maintained Weapons Inventories[19]

A report by the DOE Office of Inspector General "concluded that improvements are needed in inventory controls for excess firearms, as well as firearms that are not needed to meet current operational requirements, that are stored at the...Headquarters facility and the NNSI" [Nonproliferation and National Security Institute] in Albuquerque, New Mexico. Though "All of the firearms in our sample inventory at both facilities were accounted for...we found some firearms at the Headquarters facility that were not on the SO Headquarters inventory list and others that had serial numbers that did not match the serial numbers on the list. Additionally, we found that SO officials had not yet reconciled discrepancies identified during a 1998 inventory...of firearms stored at the facility....At the NNSI facility, we found that NNSI officials had not inventoried incoming excess firearms shipments within the time frames established by their internal procedures. In addition, we found that the officials did not, upon receipt, document the presence or integrity of tamper indicating devices (TIDs) or seals that were required to be on shipping containers of excess firearms sent to the facility." According to the OIG report, "inventory controls are necessary for these firearms, which are considered "sensitive" property."

Inappropriate Storage of Explosives[20]

A 2002 report by the DOE Office of Inspector General "...concluded improvements could be made in the areas of explosives safety, fire safety, and lightning safety. Specifically, we found that degradation review programs regarding explosives shelf-life were not fully implemented at NVO [Nevada Operations Office]...combustible material was inappropriately stored near explosives at NVO; and tests of lightning protection on NVO explosive storage magazines were not completed consistently."

Inadequate Control over Badges that Grant Access to Top Secret and Restricted National Security Information

The DOE Office of Inspector General discovered errors at DOE headquarters "that, in essence, could have allowed unauthorized individuals easy access to Department facilities...When clearances and badges are not promptly terminated, risks to Departmental facilities, property, classified materials, and the safety of its workers are increased. Our initial review disclosed that unauthorized individuals could gain access to Department Headquarters."[21]

"At Oak Ridge, 26 of the 309 records sampled indicated that former workers retained badge authority. The badge system showed that three of these individuals were entitled to Q or L badges that would have allowed them, at least theoretically, to inappropriately access restricted areas or classified information. In another case, a former Oak Ridge worker retained authority for a badge even though his employment terminated almost four years earlier...It is important to note that at Oak Ridge....a person who is inappropriately listed as an active employee in the local badge system can gain access to the site by presenting another form of identification. As we have noted in a number of reports in this area...unauthorized individuals could gain access to the Department's facilities and engage in malicious acts. The potential for transfer, conversion, or counterfeit of badges based on those improperly retained also increases the risk of harm."[22]

Falsified Weapons Tests

The NRC's Office of Investigations found that Randall G. Falvey, a Wackenhut training manager, had not ensured that shotguns were tested at the Kewaunee Nuclear Power Plant in 1997 and 1998."[23] The investigation by the Licensee also established that Mr. Falvey falsified the records of those tests in order to show that the tests had been conducted. The Licensee also reported that two shotguns which Mr. Falvey had not tested and for which he had falsified test records, failed to properly cycle..." The OI investigation determined that "Mr. Falvey provided false information about the test firings to the Licensee's Security Director..."

Falsified Drug Screening[24]

The NRC Office of Investigation concluded that Mr. David DiProspero, a security lieutenant employed by Wackenhut Corporation at the R.E. Ginna Nuclear Power Plant, near Buffalo, New York, "submitted an adulterated urine sample on May 18, 2002, and deliberately and knowingly created a false document when [he] signed a Ginna fitness for duty (FFD) form..."

DiProspero's "submittal of this false information was material to the NRC because random FFD drug testing is required by NRC regulations...[and] is one of the means by which licensees and the NRC assure that nuclear workers are not under the influence of any substance, legal or illegal, which adversely affects their ability to competently and safely perform their duties....The NRC and its licensees must be able to rely on the integrity and trustworthiness of employees. [DiProspero's] attempt to subvert the licensee's FFD program is unacceptable behavior in the nuclear industry. As a first line supervisor, [he was] in a position to direct or influence the conduct of other licensee employees. As such, [his] actions, which demonstrated a deliberate disregard for NRC requirements, were particularly egregious."

Four Security Lapses in Four Years at the St. Lucie Nuclear Power Plant in Flordia

Wackenhut Guards Removed after Failing to Complete Security Rounds

South Florida newspapers reported April 28 that six Wackenhut security guards and their supervisor were removed from duty by the St. Lucie Nuclear Power Plant after a plant audit found they took shortcuts during patrols. The episode is the fourth security incident involving Wackenhut personnel at the plant since 2000. Following the latest revelation, a local newspaper editorial criticized security at the plant, noting, "it was determined that the audit didn't occur until after another guard reported the patrol units' negligence to his supervisor." The editorial raised the question, "why did the safety of the St. Lucie Power Plant—with two nuclear units in our midst—rely on one security guard reporting other security guards' failure to keep watch?"[25]

NRC to Investigate

According to press reports, the NRC has started an investigation into security at the plant, which is owned by Florida Power & Light Co.

Unsearched and Unattended New Fuel Containers

On March 4, 2003, a number of new fuel containers were transported into the protected area of the St. Lucie Nuclear Plant, north of Palm Beach Gardens, Florida on a flat bed truck under the escort of Wackenhut security. The containers were parked outside the radiologically controlled area (RCA) fence, from where they would then be moved to the RCA "backyard" near the Unit 2 Fuel Handling Building and left unattended until the plant's operations management was ready to unload them.

An inspector discovered that the fuel containers were sealed only at one end and "became immediately concerned that this type of seal configuration could have allowed the containers to be partially opened from the other side and re-closed in an undetectable manner." Upon further investigation the inspector learned that the containers had not been searched prior to entry into the plant, and that none of the previous fuel container shipments had been searched.[26]

The St. Lucie Nuclear Plant is located 40 miles north of Wackenhut's corporate headquarters in Palm Beach Gardens, Florida.

Allowing an Unattended Visitor to Enter Protected Areas

On August 14, 2002, security personnel performing access control duties at the St. Lucie Nuclear Plant in Florida, permitted a visitor to enter the protected area, and subsequently proceed to the South Service Building without an escort and without verifying his visitor badge. After he entered the protected area the visitor was unescorted for approximately 10 minutes.[27]

Improperly Positioned Guards

On December 12, 2000 a Wackenhut officer was posted at a perimeter gate at the St. Lucie Nuclear Plant, as a compensatory measure for a deactivated alarm system. However, inspectors found that he was not in a position that allowed him to view the zone of detection such that he could provide the equivalent function of the malfunctioning alarm.[28]

Inattention to Problems with Perimeter Gates

On April 15, 2003, two guards were fired at the Oyster Creek Nuclear Power Plant, in Forked River, NJ after they were found asleep at their post.[29] An investigation by AmerGen, the plant's owner, determined that the remote control device used to raise and lower the movable gate barrier at Gate 30A guardhouse "was inoperable and was previously reported as such by other security officers who were assigned to that post." But "security management personnel did not...initiate any immediate action to resolve the condition, inform other security officers of the situation, or identify specific compensatory measures to be implemented...The inspectors' review disclosed that...patrols and supervisory personnel had been at the gate several times during the shift while the gate was in the open position, but had not recognized the condition as abnormal or contrary to AmerGen's expectations." According to the NRC's inspection report, "The finding is more than minor because the condition could be reasonably viewed as a precursor to a significant event."

Wackenhut Cut Back on Training at U.S. Nuclear Weapons Labs

Security officers must be provided with high quality training to enable them to protect our nation's most sensitive facilities. Yet just last month, it was revealed that Wackenhut cut back on training exercises recommended by U.S. Government nuclear regulatory agencies.

A March 2004 report by the Department of Energy (DOE) Inspector General found that various DOE sites "had eliminated or modified significant portions of the training while others were not using realistic training delivery methods."[30] Four sites surveyed by the Inspector General contract with Wackenhut for security. Those sites are the Nevada Test Site, the Savannah River Site, the Rocky Flats Environmental Technology Site, and the Y-12 Oak Ridge Site.

At all four of its sites, Wackenhut "eliminated or substantially modified 2 or more blocks of instruction." For example,

- At all four sites Wackenhut did not conduct basic training in the use of shotguns.
- At the Nevada Test Site and Savannah River Site, Wackenhut excluded or modified prescribed training techniques for vehicle assaults.
- At Rocky Flats and Savannah River Wackenhut excluded or modified defensive tactics.
- At none of its sites did Wackenhut include instruction in rappelling, even though it was part of the special response team core curriculum.
- At the Nevada Test Site and Oak Ridge Wackenhut eliminated or substantially modified training in the use of batons.

The Nevada Test Site was the site of U.S. nuclear weapons testing for more than four decades. Since the test moratorium in 1992, the site has been used for hazardous chemical spill testing, emergency response training, conventional weapons testing, and waste management and environmental technology studies.

For more than 40 years the **Rocky Flats Environmental Technology Site** produced plutonium and uranium components used in nuclear weapons. DOE is shutting down the plant and shipping its store of plutonium to other facilities.[31]

The Savannah River Site was constructed during the early 1950s to produce the basic materials used in the fabrication of nuclear weapons.

The Y-12 Oak Ridge Plant's mission is the dismantling of weapons components, storage of "special nuclear material," and the maintenance of the technical capability for weapons development and production.[32]

DOE: Guards Skills Cannot Be Adequately Measured

According to the DOE, sites that use unrealistic training methods did not meet departmental requirements because the skills acquired by the officers cannot be adequately measured. Moreover, use of anything less than realistic training techniques, "may rob the trainee of the exposure to the levels of force, panic, and confusion that are usually present during an actual attack." Such deviations increase the possibility that the protective force "will not be able to safely respond to security incidents or will use excessive levels of force."

An official from the DOE division responsible for nuclear safety told the investigators that they were unable to fully assess the impact of these deviations on the training programs and force readiness "because they were not provided with specific information regarding modifications to site-level training programs."

Wackenhut Compromised Nuclear Safety By Forcing Guards To Work Excessive Hours

Security officers should be alert, fit and ready to protect the facilities whose security has been entrusted to them. Yet some professional officers have found this responsibility difficult to fulfill because Wackenhut has forced some of them to work excessive hours: six and seven straight days of 12-hour shifts.

After September 11, 2001, Wackenhut instituted security changes at the Indian Point nuclear power station north of New York City. Wackenhut "increased the number of guards on each shift...by having them work more. A standard workweek now is five or six 12-hour shifts, and guards say that often, shifts are extended to 16 hours, or that they are ordered to work extra days."[33]

At the Palisades nuclear plant in Michigan Wackenhut "sharply increased the number of guards on duty," putting "guards on 12-hour shifts instead of 8, often six days a week instead of five."[34]

Kevin Augustin, a Wackenhut security officer at Xcel Energy's Prairie Island nuclear power plant (and president of the officers' union) was fired in September 2002 for sleeping on the job after working 12-hour shifts for seven days.[35]

Practice Predated 9/11 Attacks

Though excessive overtime is often rationalized by the increased security demands following 9/11, the practice in fact predates the terrorist attacks. At the Indian Point #2 power plant, Wackenhut fired Security Officer Vincent Giambalvo after he declined to report for a sixth straight 12-hour shift in June 2000.[36] The federal government ordered him reinstated, and stated that it "reasonably believed that to work in his fatigued state would have violated the NRC [Nuclear Regulatory Commission] fitness-for-duty regulation and would have posed a threat to Indian Point 2, its employees, and the community at large."[37] It was Giambalvo's firing that raised concerns about security practices at Indian Point (see page 6).

This text is a reproduction of S/O Giambalvo's original letter which can be found on the "working conditions" page at www.eyeonwackenhut.com

Date: 6-17-2000

To: LT Mitchell

From S/O Giambalvo

Subject: O.T./Safety Concern

"At approximately 10:00 am today 06/17/2000 I was mandated to work an additional 12 hours overtime on Sunday 06-18-2000. I just completed 5 straight days 12 hrs each day for a total of 60 hrs. For me to work an additional 12 hrs resulting in 6 days straight (72 hours) would be physically and mentally exhausting and would not allow me to completely forfill [sic] my duties as a security officer who carries a firearm. Therefore, I am refusing this mandatory overtime because I am fully aware of my physical and mental status and would not want to be negligent in performing my duties as a security officer. Con-Edison and Wackenhut in the last seven years had a policy that security offices [sic] will not work 60 hours or more a week unless it is a emergency. This is not a emergency. The Wackenhut Corporation over the last several weeks has bullied their security officers into working mandatory overtime above 60 hours even though this corporation is fully aware of the physical and mental fatigue of their employees. The security officers had no recourse but to comply for fear of losing their jobs. As a result of the physical and mental abuse many officers are going sick making staffing even more unbearable. If you refuse their bidding they will harass you and threaten to zero access you, this is the reason many security officers work despite their fatigue. I will be sending a copy of this letter to N.R.C. stating that the Wackenhut Corporation doesn't care for the safety of their staff and facility. They are more concerned with filling a post with a warm body that is physically and mentally drained and slow to respond when needed, than scheduling their staff in more organized manner.

Signed
S/O Vincent Giambalvo

Wackenhut Ignored Security Concerns Raised by Guards at Nuclear Facilities and Illegally Punished the Guards Who Raised Them

A safety-conscious work environment is essential at a nuclear facility, and employees' rights to voice concerns over security problems are protected by federal "whistleblower" laws.

Yet for some Wackenhut security officers, voicing their professional opinion has been hazardous to their professional health.

Wackenhut officers who have raised questions about security vulnerabilities in the nuclear facilities they guard have faced discipline, suspension and even termination. Wackenhut's retaliatory actions against its own employees have, in several cases, violated federal laws protecting whistleblowers. An investigation of public documents, reports, news clippings, and court filings found incidents stretching back for years and continuing to the present day.

In some of these cases, Wackenhut took no action to fix the problems before they became public.

Silencing a Nuclear Weapons Plant Security Officer: *Rocky Flats Environmental Technology Site, Colorado*

Mark Graf had worked for 17 years at the U.S. Department of Energy's Rocky Flats Environmental Technology Site, which produced plutonium and uranium components used in America's nuclear weapons. After Wackenhut took over security at the site, Graf witnessed the elimination of their bomb detecting unit, sloppy emergency drills, and negligence in taking inventory of the plutonium for months at a time.[38] When Graf believed that Wackenhut had ignored his concerns, he informed a US congressman and the Defense Nuclear Facilities Safety Board (DNFSB), an independent federal oversight agency; Graf was immediately reassigned. When corrective actions were still not taken, Graf gave an interview with CBS News, after which he was subjected to a psychological evaluation and placed on administrative leave. As a condition for returning to work, he was gagged from speaking to Congress, the DNFSB, and the media, under threat of job termination.[39] In December 1999 a Department of Labor judge found that Wackenhut had violated federal laws protecting whistleblowers.[40]

Wackenhut Retaliates Against Whistleblowers, Client Pays Fine: *Callaway Nuclear Power Plant, Missouri*

In 1999, Wackenhut had the security contract for the Callaway Nuclear Plant, owned by Union Electric, a subsidiary of Ameren. In a 2001 decision of violation, the NRC found Union Electric liable for penalties because of Wackenhut's 1999 violations of federal whistleblower regulations at the plant. The facts showed that Wackenhut fired Terri Elliott, one of its security officers and reprimanded a training instructor for reporting that a plant watchman had falsified his qualifications and was working in violation of federal requirements. The NRC's decision concluded that Wackenhut's investigation of the matter "was conducted with bias" — Wackenhut questioned the whistleblower's credibility instead of making "a good faith attempt" to determine whether the watchman had misrepresented his qualifications.[41]

In addition to issuing a notice of violation against Wackenhut, the NRC fined Union Electric, its client, $55,000 for these violations. According to the NRC, Wackenhut's actions "caused Union Electric to be in violation of [federal whistleblower regulations]."[42]

Then, in June 2002, after Group 4 Falck acquired the company, Stanley Batten, a Wackenhut employee at Callaway, filed a complaint against the security company alleging that Wackenhut had refused to promote him because he assisted in the earlier whistleblower investigation, and had revealed another safety concern to management. In 2003 an OSHA regional administrator agreed that Wackenhut denied Batten promotional opportunities because of his "protected activity." The company voluntarily settled with Batten in August, 2003.[43]

Current Wackenhut CEO Orders Illegal Suspension: *Salem Nuclear Plant, New Jersey*

In 1996 Marianne Griffith discovered problems with Wackenhut's perimeter security at the Salem Nuclear Plant. She reported them to her supervisor, who did nothing. With nowhere else to go, she took the information to her union, an action that led Wackenhut to suspend her.[44] Gary Sanders, the current CEO of Wackenhut, told an NRC investigation that he ordered supervisors to suspend her because she complained to her union rather than a Wackenhut supervisor, which "left him uncertain whether she was a reliable employee..."[45] In 2000, the NRC found that Wackenhut had discriminated against her for engaging in activities protected by federal law.[46]

Wackenhut-guarded Plants Under NRC Review

The Nuclear Regulatory Commission has singled out three Wackenhut-guarded nuclear power plants for in-depth review due to the high number of security-related employee allegations.

U.S. Energy Dept. Considers Federalizing Nuclear Guards

U.S. Secretary of Energy Spencer Abraham announced in May that his agency is considering the possibility of federalizing Department of Energy (DOE) security forces, including those who protect nuclear sites.[47] If implemented, the change could mean Wackenhut will no longer guard U.S. government nuclear weapons facilities, leading to a potential loss in annual revenue of as much as $237 million for the company.

Following a series of news reports about security problems at nuclear sites, Secretary Abraham described on May 7 a major new initiative to improve security at its sensitive facilities, including those that house nuclear materials. According to an official DOE news release, the initiative would expand the capabilities of DOE security personnel, including possibly federalizing some security units currently managed by private contractors, making managers more receptive to guards' security concerns, and other changes.

Wackenhut provides security services at four nuclear weapons facilities and one training center run by the DOE. A 2002 Energy Department report valued all of Wackenhut's contracts with the DOE at approximately $245 million a year.[48]

After Criticism, U.S. Energy Dept. Opts to Keep Idaho Nuclear Lab Security In-House

Wackenhut Was Expected To Obtain Subcontract Worth Up To $100 Million Over 5 Years

After criticism from Members of Congress over the bidding process, the U.S. Department of Energy changed course in late April and announced it would not contract out security services at the Idaho National Engineering and Environmental Laboratory.[49] The lab, near Idaho Falls, Idaho, houses three nuclear reactors.

In February, the DOE announced it had awarded a no-bid contract worth $40 million a year to provide security and other services at the Idaho nuclear lab to Alutiiq, LLC, an Alaskan corporation with no prior nuclear security experience. Alutiiq was expected to sub-contract the security work to Wackenhut which could have earned as much as $100 million over five years under the arrangement.[50]

The change in plans by DOE came after public criticisms by members of the Idaho congressional delegation who felt contracting out security was a flawed approach to such a vital component of the lab's operation and future.[51] The lawmakers demanded that the security provider be selected through a competitive and public process.

The controversial contracting decision at the Idaho lab puts a spotlight on the arrangement between Wackenhut and Alutiiq. Wackenhut's relationship with Alutiiq has enabled the Florida-based security firm to obtain lucrative government contracts without going through normal bidding processes. Recently, Wackenhut obtained a 49 percent share of Alutiiq's contract to provide security at the Ft. Bragg military base in North Carolina.[52]

Conclusion

Now more than ever, private security has become an issue of public safety. And at America's high-risk nuclear facilities, the stakes over public safety have never been higher.

In a post-9/11 security environment, the Wackenhut Corporation's security troubles at these nuclear sites is cause for serious concern.

Undermining the reliability of security drills, leaving security officers feeling "unprepared" to defend nuclear plants, maintaining poor inventories of nuclear weapons, leaving nuclear fuel containers unsearched and unattended, cutting back on training, and punishing security officers who voice their professional opinion about security problems are only a few of the problems that have occurred on Wackenhut's watch at U.S. nuclear facilities.

Taken together, these security lapses and problems constitute a fundamental betrayal of Americans' basic trust that their nation's nuclear infrastructure is the safest and most secure in the world. They raise significant questions about Wackenhut's steps to properly secure our nation's most sensitive sites.

Wackenhut must be held accountable to the public. Americans who depend on Wackenhut for the safety and security of their families and communities deserve answers from the company. In the end, if Wackenhut cannot adequately explain these security problems, then the company should be relieved of its responsibilities to secure U.S. nuclear facilities.

Wackenhut's long record of security problems raises questions about the contracting process at both nuclear plants, where security providers are hired by the plant owners, and at nuclear weapons facilities, where the U.S. Government or its major contractors hire private companies like Wackenhut to oversee security. And these questions are gaining new relevance in light of Secretary of Energy Spencer Abraham's announcement that his department is considering the possibility of federalizing DOE Security Forces, including those who protect nuclear sites.

Ultimately, Wackenhut's record forces us to ask the question: how much tolerance of cutting corners, lax security procedures, errors, and negligence can we afford at the facilities where nuclear bombs are stored and nuclear power is generated?

Appendix A:

In Their Own Words: Security Officers Describe Working for Wackenhut

These statements from Wackenhut officers were compiled for the report, "Nuclear Power Plant Security: Voices from Inside the Fences," produced by the Project on Government Oversight in October 2002. The officers' identities have been hidden at their request.[53]

The Project On Government Oversight (POGO) is an investigative organization that works with inside sources to improve public policy. Founded in 1981, POGO "is a politically independent, non-profit watchdog that strives to promote a government that is accountable to the citizenry." POGO takes no position on nuclear power.

Statement by Officer A. Approved September 5, 2002

He has been a guard at the plant for over 20 years. He has no retirement plan.

The guards are working 12 hour shifts, six days a week overtime—staying in compliance with the NRC by not working over 72 hours. The guards have serious fatigue and alertness problems on days 5 and 6, particularly on the night shift. In early September a guard refused to work his sixth consecutive 12-hour shift and was fired by Wackenhut.

"Morale sucks."

He talked to the NRC regional people about the problem of overtime, fatigue and morale, and there is no interest.

Wackenhut can not keep people. 70% of the guards have under one year of experience, 50-60% of the guard supervisors have less than one year of experience. However, management claims publicly there is only a 15% turnover rate.

They have handguns, shotguns, and recently got AR-15s.

They were recently ordered to carry their primary weapon for the first time.

He feels it is a serious problem that the DBT [Design Basis Threat] is essentially the same as when he arrived over 20 years ago.

The guards "don't think much of [the current DBT]" in light of the events of 9/11.

He believes they have a fair chance of beating the current DBT, but not if it is increased.
Less than 20% of the guards are former military or law enforcement personnel.

He does not trust the NRC—"They're more of a cheerleader for the nuclear industry than a watchdog."

Confusion on the guard force over the use of deadly force is a real problem.

He does not believe the utility is serious about threat to the facilities.

It will take a long time for the NRC and licensee to get their act together to adequately defend the plants.

Statement by Guard G. Approved September 5, 2002

He works for Wackenhut. A number of guards are applying for jobs as baggage screeners, because of better pay and hours.

"Morale is low. Most guards are fed up."

In the past, they worked 12-hour shifts six days a week to get ready for an OSRE test. They are now working this same kind of schedule after 9/11. They have increased the size of the force, but are also putting in outrageous amounts of overtime. Fatigue is clearly a problem.

They just stay below the NRC limit of working 72 hours in one week so they are in compliance with regulations.

They recently nearly doubled the guard force and were given AR-15 semi-automatic rifles. Until then, they only had shotguns.

The only required practice shooting is during their annual qualification, but they can go to the practice range an additional three times with pay. But, because of the overtime and scheduling, very few do. They spend about two to three hours a year practicing with their weapons.

Their only moving target practice is with a figure dragged across the range.

There are no National Guards at the plant. Their inability to defeat the current DBT is problematic. Even still the guards are concerned that the DBT is too low.

Deadly force rules are a major problem—they are only allowed to observe and report an attack.

He believes the nuclear industry does not believe there is a threat, and that the guard force is treated as a drain on profits.

Statement by Guard L.
Approved September 6, 2002

He is a former police officer who works for Wackenhut.

They are on 12-hour shifts, five to six days a week. Recently, a guard fell asleep driving home from the plant after a 12-hour shift. Fatigue and alertness are a real problem. Around guns, this is an additional problem. They have complained to the utility management, the NRC, Wackenhut and OSHA about the fatigue problem, but no one has done anything. If a guard claims he is unfit for duty because of fatigue, he is either sent to a psychiatrist or threatened with it. Some guards have an hour and a half- to two-hour drives home after these 12-hour shifts.

When they complain to the NRC about various issues, the complaints always just come back to the company Employee Concern program, and nothing happens. "We put no trust in the NRC. They are fooling the public that they are independent from industry."

"Morale—forget about it." The guard turnover is over 50% a year.

They have no rounds in the chambers of their guns. They never practice diversions or multiple entry points.

Recently, they went from shotguns to AR-15s.

They only shoot their guns during annual qualifications. Some want to shoot more, but the company will not pay for the ammunition. They are concerned they will run out of ammunition during a battle. Many guards are lousy shots.

"I've shot at people and been shot at as a cop." He is concerned about the reaction of the other guards during an attack. "Keep in mind targets don't shoot back."

"With the current DBT, single entry, limited terrorist weapons, and the guards are awake, we might be able to win. In a real attack, if the terrorists use snipers, grenade launchers and automatic weapons, we wouldn' t have a chance. Even if they only used more than the current DBT of terrorists we couldn't win."

"The plant perimeter is near a woods, where a sniper could take the guards out, and we wouldn't know what is going on."

About 50% of the guard force has military and law enforcement experience.

Because the guard force feels the management of the utility and Wackenhut do not care about the guards, many in the guard force would leave in an attack. The guards are really worried that if they are in a significant gun fight, they will run out of ammunition.

He is concerned about being taken out by snipers while the guards are in their bullet-resistant guard shacks.

They complained to management about these issues, but they are told "We are in compliance with NRC."

Deadly force is a problem. There's no training on it, and generally they are told just to "observe and report."

They have never been performance tested with outside responders. The plant strategy is "containment"—which means keeping the terrorists inside the plant while waiting for outside help for up to two or three hours. He believes it would take that long for a SWAT team to arrive. The plan is once a SWAT team gets there, they would need to do a "tabletop" exercise first in order to form their attack plan to retake the facility.

Statement of Guard P. Approved

He is a former military MP and police officer. He has "shot people and been shot at." He has been on the guard force for over eight years.

He has relayed his concerns about security problems, as well as fatigue issues through the chain of command—Wackenhut and utility management. No action was taken. He has not gone to the NRC yet.

The guard turnover rate is high. 70% of the guard force has less than two years experience, 50% has less than one year.

Until very recently, they only had hand guns and shotguns with 19 rounds, and they did not carry their shotguns. They just received AR-15s.

One of his major concerns are the Bullet Resistant Enclosures (BREs). Outside, they are elevated. He believes they are death traps. They cost about $50,000 a piece. He believes 50 caliber API rounds or RPGs would take them out.

The guards believe the terrorists will come with automatic weapons, sniper rifles, grenades and RPGs etc. The guards would be seriously outgunned, and will not have a chance. The BRE's inside are wedge shaped. He believes a grenade would blow them off their anchors, and on top of the guard.

In the response scenarios, guards depend on outside responders—which will take about two hours to respond. This has never been tested though.

He has a major concern about running out of ammunition.

During an outage, a properly cleared worker uses his badge to allow several uncleared workers with visitors badges to "piggy-back" on his badge.

NRC does compliance inspections from time-to-time. "But compliance doesn't mean you can stop a terrorist."

Prior to 9/11, from time-to-time the utility would conduct training exercises using 4-5 terrorists from two entry points. Since 9/11, however, now they are only using three terrorists from one entry point. He can not get an answer why they have downgraded the training.

They only shoot their weapons during annual requalification, about 2-3 hours per year. They have a number of guards currently that can not qualify, including a supervisor. "The utility is only concerned about the bottom line." They have spent millions on equipment—but it was the wrong equipment, like the BREs.

They run their exercises with rubber guns and whistles.

Appendix B:

U.S. Nuclear Power Plants Guarded By Wackenhut

Plant	Town	State	Owner
Arkansas Nuclear One	Russellville	AR	Entergy
St. Lucie Nuclear Power Plant	Hutchinson Island	FL	FPL Group
Turkey Point Nuclear Power Plant	Florida City	FL	FPL Group
Braidwood Nuclear Power Station	Braceville	IL	Exelon
Byron Nuclear Power Station	Byron	IL	Exelon
Clinton Power Station	Clinton	IL	Exelon (Amergen)
Dresden Nuclear Power Station	Morris	IL	Exelon
LaSalle County Nuclear Power Station	Marseilles	I	Exelon
Quad Cities Nuclear Power Station	Cordova	IL	Exelon (75%) MidAmerican Energy Holdings Corp. (25%)
Zion Nuclear Power Station (Decommissioned)	Zion	IL	Entergy
River Bend Nuclear Station	St. Francisville	LA	Entergy
Waterford III, SES	Taft	LA	Entergy
Pilgrim Nuclear Power Station	Plymouth	MA	Entergy
Palisades Nuclear Plant	Covert	MI	CMS Energy Corp.
Monticello Nuclear Generating Plant	Monticello	MN	Xcel Energy
Prairie Island Nuclear Plant	Welch	MN	Xcel Energy
Callaway Plant	Portland	MO	Ameren
Grand Gulf Nuclear Station	Port Gibson	MS	Entergy
Seabrook Nuclear Plant	Seabrook	NH	FPL Group (88%) Mass Municipal Wholesale Electric (12%)
Oyster Creek	Forked River	NJ	Exelon (Amergen)
Salem/Hope Creek Generating Station	Hancocks Bridge	NJ	Exelon (43%) Public Service Enterprise Group (57%)
Ginna Nuclear Power Plant	Ontario	NY	Constellation Energy
Limerick Generating Station	Sanatoga	PA	Exelon
Peach Bottom Atomic Power Station	Delta	PA	Exelon (50%) Public Service Enterprise Group (50%)
Three Mile Island	Middletown	PA	Exelon (Amergen)
Virgil C. Summer Nuclear Station	Jenkinsville	SC	SCANA Corp. (67%) South Carolina Public Service Authority (33%)
South Texas Project Electric Generating Station	Wadsworth	TX	Austin Energy–The City of Austin (16%) City Public Service of San Antonio (28%) Texas Genco LP (31%) American Electric Power (25%)
Vermont Yankee Nuclear Power Station	Vernon	VT	Entergy
Kewaunee Nuclear Power Plant	Kewaunee	WI	Wisconsin Public Service Resources Corp. (59%) Alliant Energy (41%)
Point Beach Nuclear Plant	Two Rivers	WI	Wisconsin Energy Corp.

Source: Wackenhut Nuclear Services Division website, at http://www.wackenhut.com/services/nuclear/facilities.htm (accessed 03/06/04)

Appendix C:

U.S. Department of Energy Sites Guarded by Wackenhut

The Nevada Test Site, north of Las Vegas, Nevada

Rocky Flats Environmental Technology Site, Denver, Colorado

Savannah River Site, Aiken, South Carolina

Y-12 Oak Ridge Protective Services, Oak Ridge, Tennessee

Wackenhut also provides security at U.S. Department Energy Headquarters in Washington, D.C. and Germantown, Maryland

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Washington, DC 20005

Mystery radiation found near Seabrook; [05 Edition]

DAVID TALBOT. **Boston Herald.** Boston, Mass.: Apr 28, 1996. pg. 001

Abstract (Document Summary)

A cloud of radiation, far below levels considered dangerous but still higher than anything previously measured in the region, drifted through Amesbury, West Newbury and Newburyport in the predawn hours of Nov. 29.

In its wake, a watchdog group pointed fingers at the Seabrook Nuclear Power Plant on the New Hampshire coastline. Plant officials said a tiny release had occurred, but nothing remotely near the levels detected.

But between 2 and 6:30 a.m. radiation detectors on rooftops in Newburyport, West Newbury and Amesbury recorded sharp spikes in airborne radiation counts - ranging up to 17 times normal background levels.

Full Text (1287 words)

A cloud of radiation, far below levels considered dangerous but still higher than anything previously measured in the region, drifted through Amesbury, West Newbury and Newburyport in the predawn hours of Nov. 29.

In its wake, a watchdog group pointed fingers at the Seabrook Nuclear Power Plant on the New Hampshire coastline. Plant officials said a tiny release had occurred, but nothing remotely near the levels detected.

Now the controversy has dissipated without any federal or state agency venturing to explain exactly what drifted on a clammy New England breeze that night.

One thing is clear: On Nov. 29 Seabrook Station, in the midst of a refueling shutdown, was bustling with activity.

At 1:53 a.m., technicians opened valves for what plant officials say was a "containment air purge" - the release of air from the concrete dome that sheaths the reactor vessel.

Neither of the plant's two resident U.S. Nuclear Regulatory Commission inspectors was on duty at that hour. Later in the day, plant officials told the inspectors of a glitch.

At 2:27 a.m., they said, the power supply for the radiation monitor on the plant's 220-foot vent stack overheated and failed, but venting continued for the 28 minutes it took to replace the system.

The vent stack also serves a building where highly radioactive used fuel is stored in water pools, and a structure where radioactive gas from the reactor vessel is processed for later release.

Plant officials said radiation alarms on all systems connected to the vent stack were always operable, and never sounded.

Seabrook reported a release of radiation so small that a person at the plant boundary would have been exposed to one quarter of one percent more radiation than they would be exposed from natural sources.

But between 2 and 6:30 a.m. radiation detectors on rooftops in Newburyport, West Newbury and Amesbury recorded sharp spikes in airborne radiation counts - ranging up to 17 times normal background levels.

The detectors were installed by a watchdog group, the C-10 Research and Education Foundation, which receives about $60,000 annually from Massachusetts to perform some of the nation's most sophisticated independent monitoring.

The levels were the highest C-10 had seen since installing the devices in 1992. C-10 calculates that if the source was Seabrook, the plant would have released 50,000 times more than the negligible radiation they reported releasing. C-10 could not estimate dose and didn't suggest it would have approached federal health thresholds.

Jim Martin, spokesman for Northeast Utilities at Seabrook, said that at those radiation levels, the plant would have declared an emergency.

"We would have been at an alert, the sirens would have sounded," he said. "We've never had anything like that - ever."

Airborne radiation is everywhere and mostly of natural origin. A C-10 detector atop a barn in Amesbury normally registers around 90 counts per minute of gamma radiation - the type that penetrates the body.

But around 3 a.m. on Nov. 29, levels jumped into the 300s and 400s, and peaked at 632 counts at 3:32 a.m. A detector atop the West Newbury Town Hall showed a similar pattern at similar times.

And in Newburyport, detectors that normally pick up about 125 counts per minute got busy around 3:30 a.m., with counts of 493, 841, 883 and 903. After 5 a.m., readings surged, peaking at 2,184 counts at 5:11 a.m.

C-10 Executive Director Sandra Gavutis said that after studying the data and local weather conditions, C-10 has discerned a radioactive "plume" coming from Seabrook.

"Everything to us indicates the source is Seabrook. Nobody else has offered another source that it could possibly be," she said.

Martin said Seabrook was not to blame.

"I'm not questioning their instrumentation, but it didn't come from us," he said. "I would like to solve it, just to validate the fact that what we are saying is true, because people have a tendency not to believe us."

David Nannai, one of the plant's two NRC inspectors, went further.

"I don't consider it a mystery. What happened at the plant is no mystery. There was nothing happening at the plant," he said.

The matter did not rate mention in the NRC's latest inspection report, aired at a meeting in Portsmouth, N.H., on Monday.

It took C-10 several weeks to notice the spikes. On Jan. 25, the group brought their data to Seabrook and the NRC.

"They were not forthcoming - it took them five weeks to get back to us," Gavutis said. "That was unusual for them."

C-10 also informed the Massachusetts Department of Health. The agency did not produce any written report on the matter, said Tom O'Connell, an engineer in the Radiation Control Program. But he discounted a Seabrook connection.

"Knowing what was going on at the power plant, looking at some of the information provided to us by C-10, as well as our own information about operation of power plants and how plumes of material spread, we did not really see that it could be attributed to a release at Seabrook," he said.

He said the Health Department did not have any explanation for the spikes, and didn't know if such high readings had ever been seen in the Bay State.

"I'd have to really look at this in a lot more depth," he said.

He went on to suggest, as Seabrook officials did, that radiation detectors can give

false readings from voltage problems, rainfall and other factors.

The manufacturer of C-10's devices said these factors could not explain the readings of Nov. 29.

Dan Sythe, owner of International Medcom in Sebastopol, Calif., said rain and snow can "wash" particles from the atmosphere to produce readings double or triple background. Sythe all but ruled out equipment problems.

"We've never had that type of failure where there is a false high level," he said. "So to have three failures of that type all at the same time, I'd say it was extremely improbable."

The Sunday Herald sent C-10's data to John Bernard, a nuclear researcher at Massachusetts Institute of Technology, who checked weather records and said the weather of Nov. 29 could not explain such high spikes. He added that no French nuclear testing was taking place.

Other than a coincidence of three sets of nearby industrial X-rays or other radiological work - or something floating in the Merrimac River that affected the West Newbury and Newburyport sites - he was at a loss. "I honestly don't know," he said.

He said the fact that only three of C-10's 14 detectors picked up anything unusual left him believing Seabrook wasn't to blame.

"Looking at the map, I'd be willing to say it isn't Seabrook - three widely spaced detectors (show spikes) and the others not see anything?" he said.

Sam Miller, a weather forecaster on the board of directors of C-10, said a stable atmosphere and mild wind like that of Nov. 29 makes this possible.

"What you wind up with is a tubelike, non-dispersive plume," he said. "It is possible for this plume to navigate between monitors without making high readings."

Paul Blanch, a former Northeast Utilities nuclear engineer - who left the company during a whistleblower episode at Connecticut's Millstone nuclear plant for which the NRC fined the utility $100,000 - said Seabrook's waste gas processing system is the likely culprit.

"In my opinion, waste gas decay tanks is the likely place where it came from," he said. "I can't think of anything else in this world that could possibly have given

those readings. I think they were real, and Northeast Utilities excused it."

Meanwhile, nobody has offered any alternative explanation, and C-10 smells a rat. "We may be the only people who have what happened in those 28 minutes," Gavutis said.

Section:
NEWS
ISSN/ISBN:
07385854
Text Word Count
1287
Document URL:

Nuclear plant cuts staff, prompting safety concerns; [Al Edition]

DAVID TALBOT. **Boston Herald**. Boston, Mass.: Dec 21, 1997. pg. 06
Abstract (Document Summary)

Back in the late 1980s, the Pilgrim Nuclear Power Station - condemned by federal regulators as one of the nation's 10 worst-run nuclear plants - closed for 2 1/2 years to fix long-neglected safety problems.

But the plant clawed its way back to respectability, cleaning up radioactive hot spots, fixing a backlog of 650 maintenance problems that peaked in 1987 and hiring more staff.

Now, with competitive pressures looming under deregulation, the Boston Edison-owned plant has been shedding employees - getting back to staff levels not seen since the early 1980s.
Full Text (296 words)

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But the plant clawed its way back to respectability, cleaning up radioactive hot spots, fixing a backlog of 650 maintenance problems that peaked in 1987 and hiring more staff.

Now, with competitive pressures looming under deregulation, the Boston Edison-owned plant has been shedding employees - getting back to staff levels not seen since the early 1980s.

The number of employees has fallen by one-third, to 633, down from 939 in 1990.

"Each one of those decisions was carefully evaluated and went through a very deliberate, controlled process during that time," said Pilgrim spokeswoman Carol Whiteman. "We've really increased productivity, I would say, through newer technology."

She said the plant hired more staff to solve the problems discovered in the late 1980s. Now, she said, efficiencies have been introduced with no effect on safety and staffing levels are in line with industry averages.

But Patti Lynn, field director of the Massachusetts Citizens for Safe Energy, a watchdog group that advocates closing Pilgrim, feared a safety erosion.

"Our big concern is that whether or not nuclear power is subsidized, owners will be running them at the outside margins of safety in order to remain competitive and make a profit," she said. "Now they are making drastic cuts again - where does that leave us?"

Nuclear power is currently the most expensive form of electricity. The deregulation bill preserved subsidies of a portion of Pilgrim's operating costs through consumer surcharges for three years.

Among nuclear plants in New England, only Pilgrim, Vermont Yankee and Seabrook Station in Seabrook, N.H., are now providing reliable electricity.

Section:
EDITORIAL
ISSN/ISBN:
07385854
Text Word Count

296
Document URL:

Seabrook owners try to block rooftop radiation monitors; [05 Edition]

DAVID TALBOT. **Boston Herald.** Boston, Mass.: Aug 25, 1996. pg. 012

Abstract (Document Summary)

Stung by allegations of an unrecorded radiation release from the Seabrook Nuclear Power Station, the plant's owners have lobbied Massachusetts officials to block funding for sensitive rooftop radiation monitors in the Bay State, the Boston Sunday Herald has learned.

The source of the apparent elevated radiation detected by three of these independent monitors in the pre-dawn hours of Nov. 29 remains a mystery after months of finger pointing and investigations centered on the New Hampshire reactor.

A special U.S. Nuclear Regulatory Commission probe - requested by the Massachusetts Attorney General after an April Boston Herald report - pronounced the plant blameless but didn't offer an alternative explanation for the readings.

Full Text (744 words)

Stung by allegations of an unrecorded radiation release from the Seabrook Nuclear Power Station, the plant's owners have lobbied Massachusetts officials to block funding for sensitive rooftop radiation monitors in the Bay State, the Boston Sunday Herald has learned.

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A special U.S. Nuclear Regulatory Commission probe - requested by the Massachusetts Attorney General after an April Boston Herald report - pronounced the plant blameless but didn't offer an alternative explanation for the readings.

In May, Northeast Utilities lobbied Massachusetts lawmakers to scuttle funding for the C-10 Research and Education Foundation, a citizen group that operates the monitors.

"We oppose the increased funding because we believe there exists adequate monitoring capabilities in the vicinity of Seabrook Station," Seabrook executive Bruce Drawbridge wrote May 7 to state Sen. James Jajuga (D-Methuen).

The letter asked that all funding be cut, arguing that Seabrook monitors radiation releases well enough on its own.

"Monitoring data provided to the public without careful analysis and clear understanding of their implications can lead to unwarranted public concern," it read.

The utility also fought C-10 last year as a Northeast Utilities lobbyist telephoned freshman state Rep. Harriet Stanley (D-Merrimack) to complain a proposed funding increase was "punitive," she said.

In six years of monitoring, the only time C-10 accused Seabrook was in March, when the group cited unprecedented readings - up to 17 times background levels - at detectors in Amesbury, West Newbury and Newburyport recorded on Nov. 29. Another 11 monitors showed nothing abnormal.

The levels were far below federal thresholds for human exposure but would have reflected a plant emergency.

The lobbying efforts failed; in the latest state budget, C-10 got a record $71,250.

Sandra Gavutis, C-10's executive director, said she thinks the utility is afraid of having a second set of eyes on them.

"I think they are concerned that we may find something," she said. "It's a little bit of industry arrogance: `Trust us - there's no need for independent monitoring.'"

Seabrook and other nuclear plants operate many radiation monitors at the plant site. But outside the plant's fences, federal regulations only require devices that record a cumulative radiation "dose," generally checked quarterly.

The devices maintained by C-10 record and preserve minute-by-minute readings of radiation "counts," so that evidence of any short burst of radiation is preserved.

Only a handful of citizen groups in the nation perform such monitoring; among them are citizens in the region around Boston Edison's Pilgrim Nuclear Plant in Plymouth.

A special NRC inspection team, after inspecting Seabrook's records from Nov. 29, concluded Seabrook not only wasn't releasing those levels of radiation, but also didn't contain sufficient radioactive gas to produce the readings.

But C-10 officials are sticking to their allegations that a "plume" came from Seabrook. They make much of the coincidence that the plant was venting while the spikes were recorded - and that the main vent stack radiation monitor was broken for 28 minutes.

"I think the state should be looking at why a nuclear power facility is allowed to continue to vent when their monitors fail," Gavutis said.

The NRC said the broken monitor - inside a vent stack that serves the containment dome, waste gas processors and the spent-fuel pools - was meaningless because other monitors "upstream" in those systems showed nothing.

The NRC report said no workers in the plant - which was near the end of a hectic 37-day refueling shutdown at the time - received significant doses Nov. 29.

"I was in containment standing over the (reactor) pool. At about that time we had just refueled the reactor and we were verifying that the control rods were latched," Marcy Campbell, a Seabrook employee, told the Herald. "If (a serious release) had happened, my head would be shaved right now."

Northeast Utilities questions whether C-10's devices made false readings triggered by simultaneous voltage fluctuations or freak weather.

"The issue is not where the radiation came from, but what caused the spiking in those electronic radiation monitors," said plant spokesman Rob Williams.

C-10 says a malfunction was highly improbable, given the coincident readings on three monitors powered separately.

But Jim Milkey, assistant Massachusetts attorney general who requested the NRC probe, said the key question remains.

"If not Seabrook," he said. "Then what?"

Section:

NEWS
ISSN/ISBN:
07385854
Text Word Count
744
Document URL:

Rep scorns mock nuke plant raids; [All Editions]

JAY FITZGERALD. **Boston Herald**. Boston, Mass.: Oct 13, 2004. pg. 036

Abstract (Document Summary)

Plymouth's Pilgrim station and New Hampshire's Seabrook nuclear facility employ Wackenhut to provide security at their plants.

"Wackenhut employees are going to be grading Wackenhut employees," said [Ed Markey], who fired off a letter to the Nuclear Regulatory Commission to complain about the arrangement. "Every facility is going to get an A grade."

Full Text (233 words)

Simulated "force-on-force" terrorist attacks against Pilgrim, Seabrook and other nuclear plants across the country will start next month in an effort to grade security at sites.

But U.S. Rep. Ed Markey (D-Malden) was already giving the federal program a failing grade yesterday for what he called a corporate conflict of interest by the security firm hired to conduct the make- believe raids.

Wackenhut Corp., of Florida, will assemble the mock "adversary forces" that will try to penetrate security at nuclear sites, even though it provides security for nearly half of the nation's 103 nuclear reactors, Markey said.

Plymouth's Pilgrim station and New Hampshire's Seabrook nuclear facility employ Wackenhut to provide security at their plants.

"Wackenhut employees are going to be grading Wackenhut employees," said Markey, who fired off a letter to the Nuclear Regulatory Commission to complain about the arrangement. "Every facility is going to get an A grade."

Federal and industry officials angrily denied the Wackenhut tests will be duds.

Wackenhut, which was hired by an industry group with federal approval to

conduct the mandatory post-Sept. 11, 2001, exercises, will establish a strictly independent group to conduct the simulated attacks, officials said.

The firm's simulated drills will be closely monitored by NRC officials, a spokeswoman said.

"Either Congressman Markey doesn't understand how the program functions or doesn't want to understand," said Steve Kerekes, spokesman for the Nuclear Energy Institute, an industry group.

Companies: Wackenhut Corp (Ticker:WAK, NAICS: 561210, Duns:00-190-3723)

Section: *FINANCE*

ISSN/ISBN: 07385854

Text Word Count 233
Document URL:

Pilgrim Security Watch

148 Washington St., Duxbury MA 02332
Tel 781-934-0389 Fax 781-934-5579 E-mail Lampert@adelphia.net

Subject: Comments Nuclear Regulatory Commission Proposed Rule 10 CFR Part 73: Design Basis Threat [RIN 3150-AH60]
Date: January 19, 2006
To: SECY@nrc.gov./(301) 415-1966.

Although the proposed rule addresses some important issues such as requiring protection against suicide attackers, insiders, and multiple attacking teams; it fails to include important measures necessary to ensure public health and safety in the event of an attack of the kind that we now can expect post 9/11.

1. Federalizing Security at Nuclear Reactors should be required to ensure protection of the public.

The principal objective of the proposed rule is "... to define in NRC regulations the level of security necessary to ensure adequate protection of the public health and safety and common defense and security." However this is not possible because the NRC limits requirements to measures that a private security force can provide. (See text, "The NRC's DBT takes into consideration ... a determination as to those characteristics against which a private security force could reasonably be expected to provide protection.")

A. The principal reasons to federalize security are that the Federal Government can provide types of securities that the industry or local/state government cannot. For example only the Federal Government can provide real on-site security against an attack by air – on site missiles such as those used in Washington DC and at the Olympic Games. And federalizing security will ensure that the decision as to how much security is required will be independent of the licensee's desires to save money.

B. Federalizing security had support in Congress, too. Senator Harry Reid introduced his "Nuclear Security Act" in November 2001, its main feature federalized nuclear power plants in the same way that government screeners are being installed at airports. However, Reid and his allies, including Sen. Hillary Rodham Clinton failed to overcome resistance from the Nuclear Regulatory Commission among others and ended up abandoning the idea, Senate and industry officials said at that time. Again it was industry's fear that to federalize security would tell the public that nuclear reactors presented a potential danger that over-rode the public's right to real protection.

2. Modes of Attack

A. Water

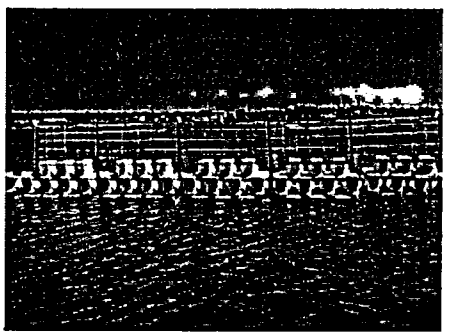
The proposed rule acknowledges an attack by water but does not require steps to prevent an attack by water.

Problem with current water defense:

Exclusion zones alone inadequate: At Pilgrim, for example, there is a 500 yard "exclusion zone", marked by buoys or floating "no-trespassing" signs. It is not impenetrable, and is not patrolled most of the time. The zones do not provide adequate protection since there are no watercraft barriers in place to prevent intrusion of a boat or floating explosive device. Trespassers have been on the beach.

Solutions:

1. Require water craft barriers: Barriers are manufactured, for example, by Wave Dispersion Technologies Inc. They make a Vessel Exclusion Barrier rises above the water a couple of feet with a fence on top. The U.S. Army Corps of Engineers have installed these barriers as part of Homeland Security programs to protect dams. They are also used to protect U.S. Naval ports and nuclear subs in Connecticut. Additionally, chain nets could be dropped from the floating barriers to ocean floor to prevent submerged explosives or divers.



See http://www.whisprwave.com/ for more information.

2. Require grates at mouth of intake canal: In 2005 the Department of Homeland Security offered to install a grate at the mouth of the intake canal at the Millstones to prevent an explosive from going up the canal and destroying the reactor's water-intake cooling systems. The licensee refused the offer; although in an August 12, 2005 news interview a Millstone spokesman acknowledged there could be a risk to public health and safety if a terrorist explosion destroyed one of the plant's water-intake cooling systems. He stated that short of a meltdown, disruption of the cooling system at the Waterford plant could result in releases of hazardous radioactive steam.

3. Require 24 –hour, armed surveillance and radar on shore to detect any boat attempting to breach the zone.

B. Air

1. Problem with current air defense:

Pilgrim NPS, an example: Since September 11, 2001, a "no fly" zone was put into effect for a short period, and was then eliminated. Because of the proximity of Boston and other airports, a "no fly" zone can not be large enough to permit effective response by Air Force or National Guard fighter aircraft. Even at the relatively slow speed of 300 miles per hour, a ten-mile "no fly" zone would provide only 2 minutes advance warning. The time for the two interceptor jets on "high alert" at Otis to be airborne is ten minutes. To be effective a no-fly zone would have to be 100 miles – crippling US air industry.

March 25, 2002, it was announced that Coast Guard helicopters would fly over the reactor site. Again, what is the probability that they would be flying overhead exactly when an attack was happening? Also Coast Guard resources are severely limited so that they fly over infrequently.

There is no capability of immediate armed response. Current NRC regulations do not require security from an air attack. However even an explosive laden helicopter could take out the control room, the brain of the reactor; or a explosive laden small plane could take out the spent fuel pool, especially in a BWR Mark I or II where the pool is located in the attic of the reactor with a thin roof overhead.

2. Solutions

Require ground based air defense systems at reactors such as Raytheon Phalanx Close-In Weapon System

Ground based air defense makes sense if one looks at the options.

A. Strengthening commercial airport security
Good idea to deal with terrorism in general but will not solve our problem – will not prevent attacks using smaller, explosive laden aircraft; nor prevent attacks from small private air fields; nor attacks from planes departing from fields outside our country; nor attacks from the 70 plus planes missing, identified by the GAO.

B. Harden the reactor building, support structures and spent fuel storage systems: Hardening everything is too expensive. Clearly moving most of the spent fuel out of the pool to secured dry cask storage – casks reinforced with earth and gravel, spaced 60 feet (not 6 feet) apart and bringing the pool back to the original low-density design would both decrease the attractiveness of the target and reduce the consequence if attacked. But we need more.

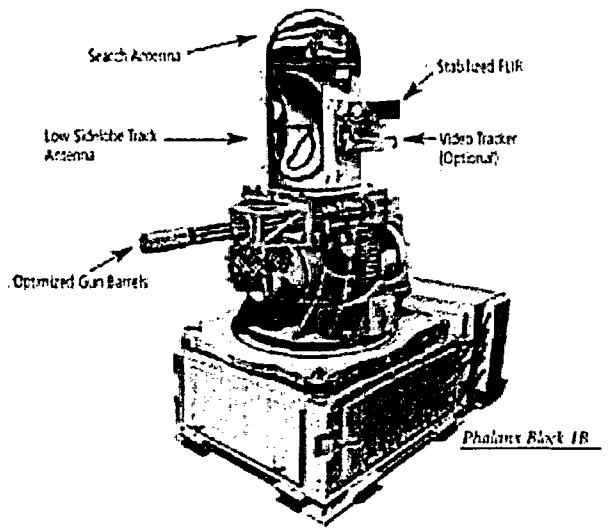
C. No-fly zones can not be wide enough. An airplane traveling at 300 miles per hour would penetrate a 10 mile keep-out zone in two minutes, far too little time for fighter aircraft on strip alert to respond. Moreover, according to the NRC data, 21 reactors are located within five miles of an airport. In order to be effective, keep-out zones would have to have radii of order of 100 miles or larger and such keep-out zones would cripple U.S. aviation. Small keep-out zones within a few miles of reactors might be useful for preventing pilots of small aircraft from making practice flights to scout out the approaches to power plants.

Keep-out zones could be effective (and would be needed) in combination with air defense weapons.

D. Fighter aircraft on continuous patrol is impractical. There are 63 active reactor sites would put a huge burden on the U.S. military. For each aircraft on patrol, several others would need to be in various stages preparation and maintenance. Thus it is likely that something of the order of 300 aircraft or more would have to be dedicated to this mission, and a much larger number of pilots, technicians, and support personnel.

E. "Beamhenge" shields as recommended by the Committee to Bridge the Gap. We are not opposed to this as one option to decrease vulnerability; however, we are advocating on-site missile systems operated by the US military, similar to those used in the summer and winter Olympics in the United States. The "Beamhenge" shield system would not protect against use of an aircraft or helicopter from dropping explosives on the reactor or necessary support structures; and it is apt not to be practical or possible to surround all potential targets – main reactor building, support structures, and spent fuel storage areas.

F. Ground-based air defense systems are therefore a better way of enforcing a keep-out zone around nuclear power plants – recommended specifically Raytheon's Phalanx Close-In Weapon System.



The Raytheon Phalanx Close-In Weapon System is appropriate for a wide range of threats and avoids problems associated with surface to air missiles. It is a rapid fire, computer-controlled, radar-guided gun system designed to defeat air threats. The Phalanx system use 20 mm bullets and is currently used on U.S. Navy vessels. It offers around the clock protection and is cheaper, safer and more reliable than other means of protection.

The computerized radar system can determine if an aircraft's flight path termination point is at the reactor site. If such a determination is made, operating personnel can verify the approaching threat and destroy it shortly before it strikes the reactor. The

system is ideal to use when the reactor is close to an airport or busy traffic lines, like Pilgrim NPS, because of its advanced analysis capabilities.

It is ideally suited to protect nuclear reactors because it is short range, which reduces the probability of killing innocent aircraft (missiles do not have this advantage); Phalanx's field of fire is programmable; it is available 24 hours a day; and it is able to differentiate between a real threat and a passing or lost aircraft.

What are the drawbacks to putting missiles in or near nuclear reactor sites? Establishing a no-fly zone might also require closing some small airports - perhaps procedures might be put in place to permit some to continue. However comparing risks against the benefits - choice is easy.

- Placing them on site reduces the potential of an attack that government studies show will contaminate 500 miles if the spent fuel is hit, or if the core is hit, a 20-mile peak fatal radius the first year and a 65 mile peak injury radius.
- We are at risk. Nuclear plants are targets and vulnerable to aircraft attacks - especially small, explosive-laden planes.
- There does not seem to be another viable response to this threat – doing nothing is not an option.
- These short-range anti-aircraft systems exist and could be rapidly deployed to greatly reduce the danger of an aircraft causing a radiological disaster.

See: J. P. Hinton et al, *Proliferation Vulnerability Red Team Report, SAND97-8203* (Albuquerque, New Mexico: Sandia National Laboratories, October 1996).

C. Land

On site security is inadequate – under-manned, under-equipped, under-trained, under-paid, unsure; help from outside will arrive too late and are not trained either. This will remain so unless the NRC specifically requires otherwise. See www.POGO.org

1. outside responders:

a. Problem – takes too long to arrive and mobilize; not trained adequately; under-equipped

In the event of a terrorist attack, the NRC does not require a facility to be able to defeat the attack without help from the outside - SWAT units from the local sheriff, State Police or the FBI. The NRC only requires that the security guards are capable of delaying the attack long enough for outside help to arrive.

However, nuclear reactors can not depend on outside help to defeat a terrorist attack. The Project on Government Accountability (POGO) consulted security experts. They agreed that a suicidal attack aimed at the reactor or spent fuel pool would be over, one way or the other, in 3-10 minutes. In fact, people familiar with NRC OSRE's tell POGO the mock attacks are usually lost in three minutes. Top NRC officials acknowledged to POGO, that tabletop security exercises show that it would take one-two hours for outside responders to arrive on the scene and get organized.

The delay results from the actions that must take place if Pilgrim makes an emergency call that it is under attack and needs outside help. These actions are:

- Assemble SWAT unit;
- Transport SWAT unit to the site;
- Conduct security briefing to inform the SWAT unit about where the terrorists are located and how they are armed; and
- Coordinate the actions of the SWAT unit with those of the guard force.

Apparently licensees have never actually tested the length of time it would actually take for an outside responder SWAT team to arrive. The NRC has recently begun a pilot program to test these timelines, but only with tabletop exercises - not actual drills.

Even if some local and State Police or local sheriffs' deputies could respond in 10-20 minutes, they do not constitute a combat force. They do not carry automatic weapons; are not familiar with the reactor layout or target sets to be protected; and have not had extensive coordinated on-site training.

NRC officials currently regard the two-hour delay in response time acceptable. They believe it would take at least an hour or two after an attack before irreversible core meltdown would occur. But the NRC has performed no analysis to support this assumption. NRC admits that if the terrorists or an "active insider" disables the reactor controls and their back-up, there would be nothing outsider responders could do.

Pilgrim, example: After 9/11, a few National Guardsmen were assigned to patrol outside Pilgrim's property – not on site. Their purpose is essentially to serve as the canary in the coal mines – if shot, a warning to on-site guards. They are basically referred to as "eye candy." They have not trained on site with on site security; nor toured the site - according to a report by the former security guard trainer, summer 2005. The State Police supposedly arrive by helicopter. The landing pad is directly adjacent to the hydrogen storage tank on Route 3A. This is dangerous because in a moist salt air environment the whirling copter blades create sparks – they risk blowing up. Also the State Police require transport from the helicopter landing pad on Route 3A to the reactor site – adding delay.

b. Solution

The real solution is to federalize security – so properly trained and equipped personnel with prior authority can immediately and appropriately respond. A half measure would be to require an increase in the number of National Guard around the perimeter; have actual on site, mock attack training drills with on site security on the premises; supply the Guard with appropriate weapons.

2. On-site security at nuclear reactors:

a. Problems

1. Under-manned: Prior to 9/11, the Nuclear Regulatory Commission (NRC) required only five to ten security guards on duty per nuclear reactor. Since then, the NRC has ordered the utilities to minimally increase the guard force. But more than half the

guards the Project on Government Oversight (POGO) interviewed say their plants are relying on increased overtime of the existing guard force -- up to six consecutive days of 12-hour shifts -- rather than hiring more guards. Guards raised serious concerns about fatigue. While a few guards said their plants have increased the guard force -- one plant has tripled the number of guards -- most interviewed believe that they are still below adequate levels to defeat a real terrorist attack. In fact at Pilgrim a security trainer stated summer 2005 that there are not enough guards to man all the checkpoints- the first line of defense. Pilgrim's security workers went on strike during the summer, 2003 protesting 12 hour shifts for 4 days without 3 consecutive days off. Pilgrim has a 72 hour work limit per week. 72 hours is too many hours week-after-week – especially when many guard jobs are boring (example sitting in a tower) but require being alert. Overtime is expected. Security workers stated that overtime at Pilgrim made some work weeks extend to 104 - 108 hours. If overtime is refused, they know that the worker is let go.

2. Rotating shifts: At Pilgrim workers complained that they work one week days and the next week nights resulting in an inability to establish a sleep pattern and exhaustion. This should not be allowed.

3. Under-trained: Nuclear industry executives have repeatedly claimed that guards receive 270 hours of training before being posted; 90 hours per year to re-qualify with their weapons; and 30 hours per year in antiterrorist tactical exercises. None of these claims appear to be true. Most guards interviewed train with their weapons only once per year (Pilgrim included) for two to three hours during their annual weapons qualification. Most also have had no training or practice in shooting at a moving target. "Tabletop" exercises are rudimentary.

For example: According to two former Seabrook nuclear power plant guards who were hired post-9/11, they were only given four days of tactical training and three days of weapons training before being posted. Neither they, nor any of the other 14 recruits in their training class, had military or law enforcement experience. The majority of those recruits had never even fired a weapon before. Yet during their training they were limited to firing 96 rounds with their handguns and fewer rounds with their shotguns, and were told they "would not be firing our service weapons again until the annual qualifications." The guards said they informed the trainers more training was necessary, but were told that if they wanted more practice with the weapons, it would have to be on their own time and at their own expense.

Also there are too few security guard trainers. At Pilgrim [summer 2005], for example, there were 2 security guard trainers – one had left June 3, 2003 leaving only two people to do training, revamp department and carry out the NRC October 2003 order.

4. Under-equipped: Many of the guards believe they are not equipped with adequate weaponry. The power and range of weapons provided to many of the guards is vastly inferior to the weapons known to be used by terrorists, due in part to restrictive state laws. According to one guard, terrorists will come armed with automatic weapons, sniper rifles, and grenades and the guard force "would be seriously outgunned, and won't have a chance." Federal law prohibits security guards from using automatic weapons, even though they are expected to face them in an attack. Pilgrim guards stated they now have 9 millimeter guns and need 45 millimeter; bullet proof vests are only in sizes large and extra large –unsuited for many workers

– and only have 12 vests, summer 2005. Does that mean only 12 guards? Do they have Kelvar helmets? At Pilgrim they have night vision for weapons but no mount for it on the rifles.

According to a US Army demolition manual (FM 5-25/May 1967), just two 75 pound backpacks of high explosive (PETN) will blow a twelve foot diameter crater six feet deep at its center in heavily reinforced concrete. This is for untamped explosive, (i.e., just laid on the surface).

5. Underpaid: Low wages and inadequate health, disability and other benefits are causing turnover in the guard force at some plants as high as 70-100% over the 3½year life of a labor contract. At six nuclear facilities identified by POGO, security guards were being paid $1 to $4 less per hour than custodians or janitors. Guards also often earn less than workers in their area who face substantially less risk such as funeral attendants, manicurists, and aerobic instructors.

6. Unsure: Nearly all of the guards interviewed by POGO raised concerns about the lack of guidance on the use of deadly force. Guards are currently restricted from using deadly force unless an intruder is wielding a weapon or threatening the life of an individual. If a suicidal terrorist with a backpack (possibly containing explosives) jumped the fence and headed straight for a spent fuel pool or reactor, the guard could only observe and report the event. One guard summed up the problem stating: "If you pull the trigger, you're on your own and you'll need a good lawyer."

7. Background checks are made in the U.S. but not out-of-the-country.

8. Guard Towers serve no purpose other than PR. They are simply sitting ducks – targets. Towers are not constructed to keep out the caliber ammunition likely to be used by terrorists. If fired upon, the guard unless suicidal, would not open the portal to shoot back. The long hours and boredom make it unlikely that the guard in the tower will remain alert to even notice a problem.

9. Control Room requires ventilation; they take in some outside air. However what is to prevent crop duster or trucks releasing chlorine gas to kill operators? What is the capability to close off outside air and use supplemental air systems and for what duration?

b. Solution

Appropriate solutions are, in part, mentioned throughout the "land-problem" discussion above.

The real solution is to federalize security.

1. Short of that, it is obvious that the NRC must require and enforce regulations so that security workers are not fatigued.

A. Shorter work schedules. We understand that the NRC directed that security guards on average work no more than 48 hours a week at any plant and plant operators had a transition period to put the order into effect – some cases until October 2004. What does "on average" mean? It should mean 48 hours, period –

including overtime. We are told security workers worked more than 48 hours a week at Pilgrim NPS.
B. Non-standard work schedules are discussed on the following website. http://www.wws.princeton.edu/ota/disk1/1991/9108/910803.PDF. Work schedules outside the standard daytime hours can disrupt the biological rhythms of the body. This disturbance can continue unabated while other factors, such as sleep loss and social disruption, compound the deleterious effects. The results can be detrimental to some workers' health and ability to perform their jobs, which in turn can adversely affect their safety and that of society as a whole." The practice of switching a worker's work schedule from day to night from one week to the next is especially dangerous and should be prohibited – a sleep pattern can never be established. A separate staffing crew should be assigned permanently to work the night shift.

2. Staffing must be increased to match the number of attackers on 9/11; they must be properly trained and equipped; and regulations requiring that only workers with complete background checks can be hired.

3. TESTS OF SECURITY – ignored in proposed rule

Security inspections and force-on-force Operational Safeguards Response Evaluation (OSRE) program exercises must be upgraded to conform to the proposed DBT regulations - they must demonstrate high confidence to be able to repel a September 11, 2001, level assault.

The following flaws identified by Riverkeeper concerning the OSRE security test performed at Indian Point are discussed below and we concur with their recommendations (1-10) to improve the tests.

A) There is too much advance notice. Indian Point has had months to prepare for their OSRE drill, summer 2003. Entergy knew the exact date of the test. They could make sure all equipment was in top working order and that all security officers were fully trained on their response duties. In reality, the attackers are unlikely to provide early warning. Thus, intrusion equipment may be out of service for repairs and security officers may be new to the job without fully understanding their duties.

REQUEST: The right way to perform the OSRE drills is with short notice - about two or three weeks. That would provide enough time to arrange "cover" security (during the OSRE, real security officers with real guns must be present but not involved in the exercise in case a real attack were to occur) but not enough time to correct problems. When notified, plant operators should be required to "freeze in place" the security force to be tested, rather than calling in their most capable security officers. When notification occurs months in advance companies have time to hire security-training consultants and additional guards to improve their security posture and chances of success in deterring a mock attack. A nuclear industry representative acknowledged that utilities spend 'millions of dollars' getting ready for the tests. The security officers said that for months prior to a test, they repeatedly practice for the two or three scenarios on which they will be tested, often with the help of the consultants. The problem, according to the guards, is that they train only on the particular attacks that will be used in the test rather than on many different types of attacks. Once the tests are completed, the security consultants are let go and the guard force reduced until the next test.

B) The OSRE drills set a low bar to hurdle by using a low passing grade. The OSRE drill typically features four force-on-force exercises. Each exercise features the mock intruders attempting to destroy every piece of equipment on a "target set" and the armed security officers trying to prevent it. The plant security defense team has to win at least three of the four exercises for the plant to get a bad grade. In real life, there would be no second chances.

REQUEST: Good security should be scoring 100 rather than 75 on the OSRE drill.

C) The OSRE drills are almost always performed with the plant at full power during evening or midnight shifts, i.e. during a time when the number of workers at the plant is minimal. The armed responders, knowing that an OSRE drill is in progress, can literally shoot at anything that moves and be assured it's an attacker. In reality, the armed responders would have to spend a few seconds distinguishing between friend and foe. Having no "innocent" workers around makes it easier for the defenders and harder for the attackers. In addition, the OSRE drills are never run during outages. During outages, the equipment to be protected is different and the containment barriers may already be breached (opened for refueling).

REQUEST: OSRE drills should be performed during outages and security officers must be trained and tested to differentiate between plant workers and attackers.

D) The OSRE drills limit the insider role to that of a passive participant. The security regulations have long specified that the attackers can be aided by one insider acting in either a passive or active role. The OSRE drills to date and as planned have limited the insider role to that of a passive participant. In other words, the insider provides information to the attackers so they can plan their assault. But the insider does not take an active role (i.e., creating a distraction, damaging target set equipment or security equipment, etc.)

REQUEST: OSRE drill should involve active participant(s).

E) The OSRE drills to date and as planned have only involved attackers originating from one direction as one team. The September 11th attack and subsequent attacks abroad in Saudi Arabia and Casablanca have involved multiple teams and attacked from multiple directions. A successful terrorist attack on a reactor or spent fuel pool could result in tens of thousands of casualties.

REQUEST: OSRE drills should assess the ability of plant security to defend against teams of 4 or 5 attackers originating from multiple directions.

F) The OSRE drills to date and as planned only require plant security to defend against a small number of attackers. The attacks of September 11th on U.S. soil and more recent attacks abroad involved 19 or more terrorist attackers.

RECOMMENDATION: At a minimum, the OSRE drills should assess the ability of plant security to defend against twenty or more attackers, in teams of 4 or 5, and attacking from multiple directions.

G) The OSRE drills do not assess plant security's ability to defend against an attack on the spent fuel pool. More than 300 OSRE exercises have been conducted since 1991. A grand total of zero (0) of these exercises has been run with the spent fuel as

the target.

REQUEST: OSRE drills should include the spent fuel storage pool as the target of at least one exercise during the OSRE drills.

H) NRC, after intensive consultation with the nuclear industry, did not seek public input while revamping the OSRE exercises.

REQUEST: The NRC should receive input from representatives of public interest groups on security policy issues.

I) a plant owner which performs poorly on an OSRE drill is not subject to enforcement actions.

REQUEST: A plant owner that performs poorly during an OSRE drill should be subject to an enforcement action. If a plant owner repeatedly performs poorly, the NRC should order the closure of the plant, until the plant owner improves its performance during the OSRE drill.

J) No independent observers, those without a vested interest, are present to monitor and evaluate the drills.

REQUEST: The NRC should allow independent observers, i.e. congressional staff with security clearance, to observe and evaluate the OSRE drills to ensure that the drills are not staged and provide an accurate assessment of plant defenses.

K) Results on Tests not publicly available (beginning 8.04.)

REQUEST: Certainly, some security information is best kept behind locked doors. But this blanket directive includes anything and everything, and will inevitably restrict the release of potentially embarrassing, but not necessarily dangerous, information. Communities around nuclear plants have an inherent right to know what is going on next door.

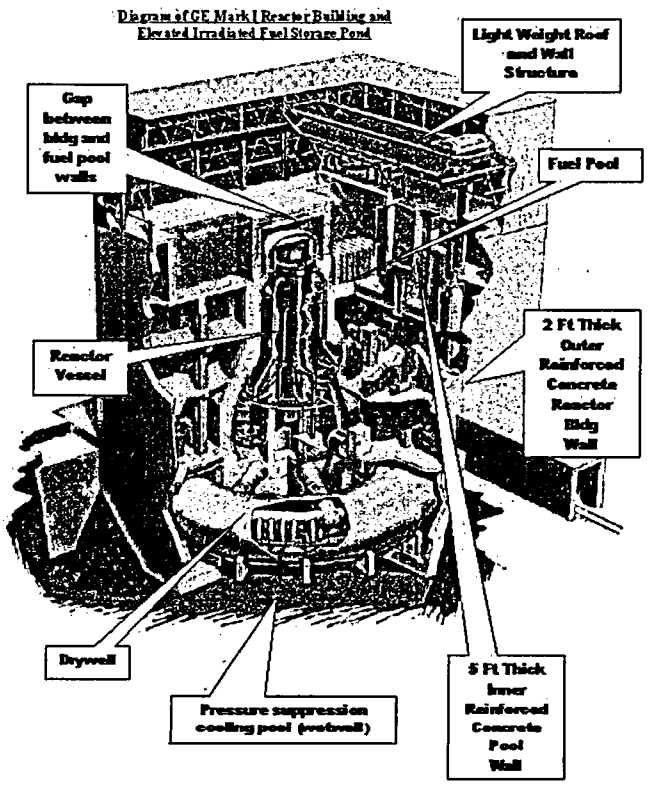
L) Wachenhut, the foreign –owned company that provides security for half the nation's reactors, will also test reactor's security.

This is a conflict of interest and provides no incentive to seriously challenge the guards; the company is foreign owned and this raises questions in that airport security by foreign owned companies is not allowed; and Wachenhut has a poor track record. POGO, for example, explained in a July 30, 2004 letter to NRC Chairman Nils Diaz that, "As recently as last January, DOE inspector general reported that Wackenhut personnel had cheated during a force-on-force exercise of June 2003 at the Y-12 plant in Oak Ridge, Tenn. This facility houses hundreds of tons of highly enriched uranium. The inspector general, Greg Friedman, said the test results were "tainted and unreliable." Moreover, Friedman gleaned from more than 30 testimonies that this was part of "a pattern of actions" dating back almost two decades."

REQUEST: The NRC should return to the previous practice of security testing to the U.S. federal government- design, performing the attacks, evaluation of the exercises - so that tests are credible.

4. Targets – Spent Fuel

Spent fuel storage on site deserves special attention. The National Academy of Science was mandated by Congress to analyze the vulnerability of spent fuel storage on site. They concluded terrorist attacks on spent fuel pools are possible ---a credible threat; and if a terrorist attack on the spent fuel pool lead to a zirconium cladding fire, it could result in large amounts of radioactive material spreading perhaps 500 miles downwind. All spent fuel pools were vulnerable; however 32 reactors, Boiling Water reactors with Mark I and II Containments were identified as especially vulnerable to attack – reactors such as Pilgrim NPS and Vermont Yankee. An August 10, 2004 Petition was submitted to the NRC by the Nuclear Security Coalition and we support its contentions and recommendations.



A. Spent Fuel Pools

1. Problem Spent Fuel Pools – as described by the National Academy of Sciences, Safety and Security of Commercial Spent Nuclear fuel Storage Public Report, April 2005. To access the report www.nap.edu/books/0309096472/html

> *"Finding 2A: Spent fuel storage facilities cannot be dismissed as targets for such attacks because it is not possible to predict the behavior and motivations of terrorists, and because of the attractiveness of spent fuel as a terrorist target given the well known public dread of radiation...The committee judges that attacks by knowledgeable terrorists with access to appropriate technical means are possible."p.4*

"The potential vulnerabilities of spent fuel pools to terrorist attack are plant specific ... there are substantial differences in the designs of spent fuel pool that make them more or less vulnerable to certain types of attack"p.6

"The vulnerability of a spent fuel pool to terrorist attack depends in part on its location with respect to ground level as well as its construction. Pools are potentially susceptible to attacks from above or the sides depending on their elevation with respect to grade and the presence of surrounding shielding structures."p.43

"The spent fuel pool, (GE Mark I BWR reactors) is located in the reactor building well above ground level. Most designs have thin steel superstructures. The superstructures and pools were not, however, specifically designed to resist terrorist attacks."p.41

A loss-of-pool-coolant event resulting from damage or collapse of the pool could have severe consequences. Severe damage of the pool wall could potentially result from several types of terrorist attacks, for instance: (1) Attacks with large civilian aircraft; (2) Attacks with high-energy weapon; Attacks with explosive charges (NAS, p. 49)

Finding 3B –... a terrorist attack that partially or completely drained a spent fuel pool could lead to a propagating zirconium cladding fire and the release of large quantities of radioactive materials to the environment. Details are provided in the committee's classified report (NAS, p 6)
Such (zirconium cladding) fires would create thermal plumes that could potentially transport radioactive aerosols hundreds of miles downwind under appropriate atmospheric conditions(NAS, p. 50)

The excess cancer estimates ...to between 2,000 and 6,000 cancer deaths (NAS, p. 45)

2. Solutions

a. The real solution is low-density, open frame racking in the pool and hardened, dispersed, on-site dry cask storage as an interim measure until all spent fuel can be moved off-site.

b. NAS recommended immediate steps to prevent a fuel fire – reconfiguring or checker-boarding the fuel in the pool; putting in a spray water system; and limiting the frequency of off-loads of full reactor cores. It is important that these steps are viewed as only immediate steps; that they are limited in their effectiveness; and long term measures are required.

1) Reconfiguring the Spent Fuel Pool

To reduce spent fuel pool vulnerability, the National Academy of Sciences recommended that the fuel pool be rearranged so that the recently unloaded, very hot fuel is dispersed in the pool among the older and cooler fuel. The analysis of the effectiveness of this is plant specific. It appears that even if the recently discharged spent fuel is mixed with the older, cooler fuel, there is still a high likelihood of a zircaloy fire for a period of time after discharge from the reactor. There are many

variables such as burnup, age, type of fuel, density and temperature that will need to be analyzed for each plant and fuel configuration.

However, shifting the fuel around will yield only a small reduction in risk. It will be useless if there is partial drainage of water or if debris blocks air flow in a drained pool.

Specifically:
(1) Checker boarding with full pool and tight racks -- small risk reduction.
(2) Checker boarding with 5-year fuel only and tight racks -- better risk reduction.
(3) 5-year fuel only and open-frame racks -- best risk reduction.

2) Spray Cooling System Installed in Pool

To reduce spent fuel pool vulnerability, the National Academy of Sciences recommended that a spray cooling system be installed and specified that the system must be capable of operation even when the pool is drained (which would result in high radiation fields and limit worker access to the pool) and stay in tact even when the pool or overlying building, including equipment attached to the roof or walls, are severely damaged. These requirements are unlikely to be met.

Pilgrim spokesmen have stated publicly that hoses could be brought to prevent or put out any fire. This is not so.

If water is lost from a spent fuel pool recently discharged fuel can ignite in a period as short as 1-2 hours. Actual period depends on the time since the reactor shutdown for refueling. There is at present no pre-engineered means of spraying water into a drained pool to keep the fuel temperature below the ignition point. Human access with hoses could be precluded by fire or high radiation fields generated as part of the attack, or by other disabling mechanisms such as chemical weapons. Sophisticated attackers might attack the reactor and the pool, using the radiation field from the damaged reactor to preclude access to the pool. Once ignition had occurred, spraying water into the pool would feed the fire through the exothermic steam-zirconium reaction. A massive and probably impractical flow of water would be needed to overcome the effect.

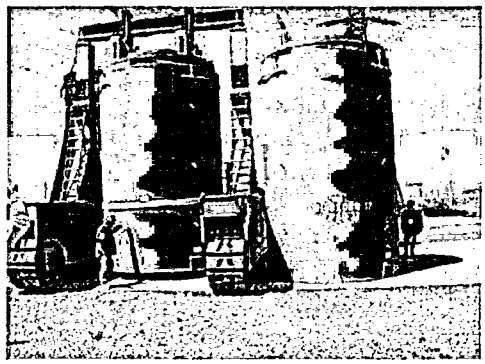
Following an event at the Connecticut Yankee nuclear plant on August 21, 1984, the NRC issued Bulletin 84-03 requiring licensees of operating nuclear plants to among other things calculate the radiation doses in the vicinity of the spent fuel pools should the water level drop. By letter dated November 29, 1984, the licensee of the Connecticut Yankee and Millstone nuclear plants provided the NRC with its response to Bulletin 84-03. The licensee informed the NRC that the calculated radiation dose rate near the edge of a drained spent fuel pool was 40,000 Rem/hr. The dose rate for Millstone Unit 3 was 19,000 Rem/hr. These calculations are representative of the replies received by the NRC from other plant owners. Workers would receive a lethal dose of radiation in 40 to 85 seconds if exposed to such high levels. Twenty years have passed since those calculations and the tons of additional spent fuel crammed into the Millstone pools have only increased the potential radiation hazards. Given the 25 Rem emergency worker dose limit articulated by the NRC in Information Notice No. 84-40, workers could only visit the area of the spent fuel pool railing for 2-5 seconds, scarcely enough time to position a fire hose and lash it in place.

3) NAS also recommended as an immediate step to limit the frequency of offloads of full reactor cores into the spent fuel pools, require longer shut downs of the reactor before any fuel is offloaded, and provide enhanced security when such offloads must be made.

B. Dry Cask On-Site Storage

1. Problem
NAS stated that dry casks were less vulnerable to attack because casks are passive; casks are located at or below ground level making attack more difficult; the fuel is more spread out. However, the Academy cautioned that casks are still vulnerable to attack. They are vulnerable to attack especially the way industry has chosen to store casks – place them on a concrete pad, not unlike a basketball court, and line them up about 6 feet apart like bowling pins.

2. Solution
NAS suggested, "..... simple steps that could be taken to reduce the likelihood of releases of radioactive material from dry casks in the event of a terrorist attack - such as spreading the casks further apart, constructing mounds around the casks.

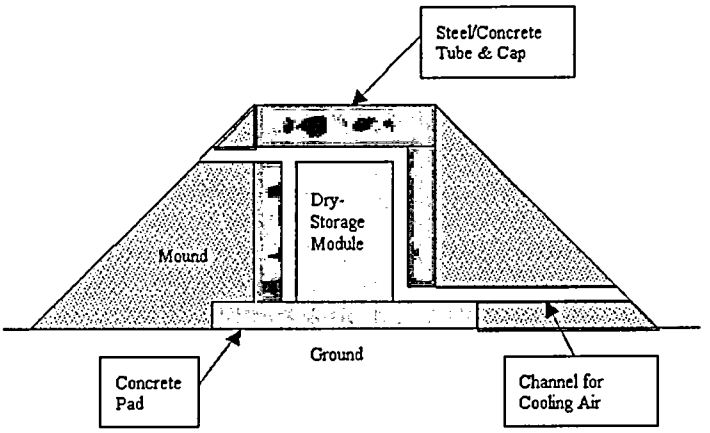


Dry Casks

Typically when industry moves to dry cask storage, they place the casks on a concrete pad – like bowling pins waiting for a strike. However, it is not September 10th; therefore it is necessary to place them in a less vulnerable position. The schematic below by Dr. Gordon Thompson makes sense.

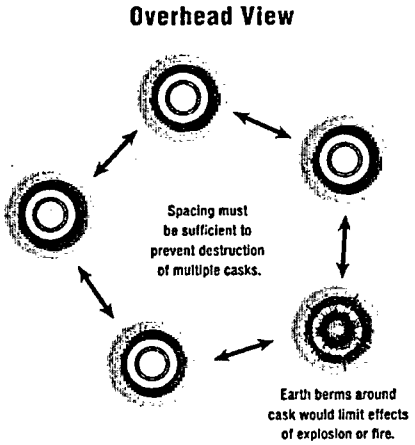
a. Dry Casks Need to Be Secured or Hardened - two proposals

PROPOSAL #1 Dispersed Hardened Cask Storage Proposal



SCHEMATIC VIEW OF PROPOSED DESIGN
FOR HARDENED, DRY STORAGE

Disperse casks so that they are a more difficult target. Pilgrim has plenty of room; it sits on 1600 acres.



b. PROPOSAL#2 Holtec Underground Storage Proposal

Holtec International, a major cask design and manufacturing company, stated that they would ask the NRC to approve an underground design for a dry storage cask facility (NuclearFuel, Vol. 29, Number 9, April 26, 2004). According to Holtec's President/CEO the design is a low-profile system – all but two feet of which would be below ground – offers "the next level of protection against terrorist attacks." The new system uses the same inner canister and ancillary equipment NRC has already approved as part of their Hi-Storm 100 cask system. The new system known as Hi-Storm 100U, uses a large concrete block with metal-lined cavities to hold spent fuel storage canisters. Once the canisters are in place, a lid is secured to each cavity. Canisters are passively cooled and can hold the same heat load as the existing system. Holtec says that the system can be used at any site, even on a coastal plain or site with a high water table, because the metal canisters are welded and completely sealed off from the surrounding substrate. Preservatives will be applied to protect the concrete from groundwater. A surveillance program would monitor for

groundwater. At issue is will being out of sight be out of mind; and how effective will the monitoring be to assure no leakage?

Because with either proposal risk is reduced and not eliminated, it is important that full security and emergency planning be maintained until operations cease and all waste is removed from the site.

5. Comments Section-by-Section Analysis (part IV proposed rule)
The proposed rule included a table to provide a comparison between the proposed rule text and the current rule text. My comments are inserted in bold italics.

Old	New	Change
(1) Radiological sabotage. (i) A determined violent external assault, attack by stealth, or operation as one or more teams and deceptive actions, of several persons with the following attributes, assistance and equipment:	(1) Radiological sabotage. (i) A determined violence external assault, attack by stealth, or deceptive actions, including diversionary actions, by an adversary force capable of operating as one or more teams, attacking from one or more entry points, with the following attributes, assistance and equipment:	The proposed paragraph adds new capabilities to the DBT including attack from multiple entry points. ***Does the rule, as it should, specifically cover attack at same time?***
(1)(i)(D) hand-carried equipment, including incapacitating agents and explosives for use as tools of entry or for otherwise destroying reactor, facility, transporter, or container integrity or features of the safeguards systems, and	(1)(i)(D) hand-carried equipment, including incapacitating agents and explosives for use as tools of entry or for otherwise destroying reactor, facility, transporter, or container integrity or features of the safeguards systems, and	This description is not revised by the proposed rule. ***Does it cover, as it should, capability weapons penetrate reinforced concrete and incapacitating agents to control room?***
(1)(i)(E) a four-wheel drive land vehicles,	(1)(i)(E) land and water	The scope of vehicles licensees must

vehicle used for transporting personnel and their hand-carried equipment to the proximity of vital areas, and	which could be used for transporting personnel and their hand-carried equipment to the proximity of vital areas, and
defend against would be expanded to include water vehicles and a range of land vehicles beyond four-wheel drive vehicles. ***Does it cover, as it should grates to prevent explosives up intake canal***	
(1)(ii) An internal threat of an insider, including an employee (in any position), and	(1)(ii) An internal threat, and
The current rule describes the internal threat as a threat posed by an individual. The language would be revised to provide flexibility in defining the scope of the internal threat without adding details that may be useful to an adversary. ***Key- does it refer to active insider?***	
[[**Page** 67384]]	
(1)(iii) A four-wheel drive land vehicle bomb.	(1)(iii) A land vehicle bomb assault, which may be coordinated with an external assault, and
The proposed paragraph would be updated to reflect that licensees are required to protect against a wide range of land vehicles. A new mode of attack not previously part of the DBT would be added indicating that adversaries may coordinate a vehicle bomb assault with another external assault. ***Add or internal assault***	
None	(1)(iv) A waterborne vehicle bomb assault, which may be coordinated
The proposed paragraph would add a new mode of attack not previously	

with an external assault.

part of the DBT, that being a

waterborne vehicle bomb assault.

This paragraph also adds a

coordinated attack concept. ***Add explosive up intake and***

define "waterborne assault" to include unmanned raft or debris

loaded with explosives

(

2) Theft or diversion of formula	(2) Theft or diversion of formula
The proposed paragraph would add new quantities of strategic special nuclear material. (i) A determined, violent, external assault, attack by teams and attack from multiple entry points. ***Specify "simultaneously"*** a small group with the following attributes, assistance, and equipment:	quantities of strategic special nuclear material. (i) A determined adversary capabilities to the DBT including operation as one or more violent external assault, attack by stealth, or deceptive actions, including diversionary actions, an adversary force capable of operating as one or more teams, attacking from one or more entry points, with the following attributes, assistance and equipment:
(2)(i)(B) Inside assistance that may facilitate include a knowledgeable individual who attempts to participate in a passive role (e.g., provide information), an active role (e.g., facilitate entrance and exit, disable alarms and communications, participate in violent attack), or both;	(2)(i)(B) Active (e.g., The reference to an individual would be removed and the paragraph reworded to provide flexibility in defining the scope of the inside threat. ***Not clear meaning here.*** entrance and exit, disable alarms and communications, participate in violent attack) or passive (e.g., provide information), or both, knowledgeable inside assistance,
(2)(i)(C) Suitable weapons, up to and including hand-held automatic weapons, equipped with silencers	(2)(i)(C) Suitable weapons, The phrase ``up to and including'' was changed to ``including'' to provide flexibility in defining the including hand-held automatic weapons, equipped with silencers

and having effective long-range accuracy;	and having effective long-range accuracy;
range of weapons licensees must be able to defend against. ***What about night vision mounts etc***	
(2)(i)(D) Hand-carried equipment, This description is not revised by including incapacitating agents and explosives for use as tools of entry or for otherwise destroying reactor, facility, transporter, or container integrity or features of the safeguards system; and the proposed rule.	(2)(i)(D) Hand-carried equipment, including incapacitating agents and explosives for use as tools of entry or for otherwise destroying reactor, facility, transporter, or container integrity or features of the safeguards system;
(2)(i)(E) Land vehicles used for transporting personnel and their hand-carried equipment; and vehicles, The scope of vehicles licensees must defend against would be expanded to include water vehicles and a range of land vehicles beyond four-wheel drive vehicles.	(2)(i)(E) Land and water vehicles which could be used for transporting personnel and their hand-carried equipment; and
(2)(i)(F) the ability to operate as two or more teams. This requirement would be included in Sec. 73.1(a)(2)(i).	Deleted
(2)(ii) An individual, including an employee (in any position), and (2)(iii) A conspiracy between an individual. The language would be revised to provide flexibility in defining the scope of nuclear power plants or the facilities referred to in Sec. 73.20(a), or (A) Access to and detailed knowledge of the internal threat without adding details that may be useful to an adversary. (B) items that could facilitate theft of special nuclear material (e.g., small tools, substitute material, false documents, etc.), or both. The current rule describes the internal threat as a threat posed by individuals in any position who may have:	(2)(ii) An internal threat, and
None The proposed paragraph would be coordinated	(2)(iii) A land vehicle bomb assault, which may be updated to reflect that licensees

	with an external assault, and
are required to protect against a wide range of land vehicles. A new mode of attack not previously part of the DBT would be added indicating that adversaries may coordinate a vehicle bomb assault with another external assault.	
None	(2)(iv) A waterborne vehicle bomb
The proposed paragraph would add a coordinated new mode of attack not part of the DBT, that being a waterborne vehicle bomb assault. This coordinated attack concept is another upgrade to the current regulation. ***Missing from proposed rule -air/training/ tests/need to federalize***	assault, which may be previously with an external assault.

Comments submitted on behalf of,

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From: "Herb Moyer" <hmoyer@gwi.net>
To: <SECY@nrc.gov>
Date: Thu, Jan 19, 2006 7:45 AM
Subject: SAPL Comments on DBT Proposed Rulemaking

Subject: Comments Nuclear Regulatory Commission Proposed Rule 10 CFR Part 73:

Design Basis Threat [RIN 3150-AH60]

Date: January 18, 2006

To: SECY@nrc.gov./(301) 415-1966.

NRC Commissioners,

Please accept the following comments and documents as part of the Seacoast Anti-Pollution League's efforts to help increase nuclear plant safety around Seabrook Station, and indeed around every nuclear plant in the U.S.

Respectfully submitted,

Herb Moyer, President

Seacoast Anti-Pollution League

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Subject:	SAPL Comments on DBT Proposed Rulemaking
Creation Date:	Thu, Jan 19, 2006 12:07 AM
From:	"Herb Moyer" <hmoyer@gwi.net>
Created By:	hmoyer@gwi.net

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HomelandInsecurity-Wackenhut.pdf	137659	
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Options

Expiration Date:	None
Priority:	Standard
Reply Requested:	No
Return Notification:	None
Concealed Subject:	No
Security:	Standard