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 USNRC

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OFFICE OF SECRETARY  
 RULEMAKINGS AND  
 ADJUDICATIONS STAFF

Dear NRC Rulemakings and Adjudications Staff:

I write in strong support of the Committee to Bridge the Gap's Petition for Rulemaking to significantly strengthen protection of nuclear reactors against a terrorist attack from the air and upgrade the design basis threat. NRC's laissez-faire approach to the current threat is unjustifiable and dangerous.

The latest warnings by Osama bin Laden, issued just yesterday, underscore the fact that al Qaeda continues to plot attacks against the United States. Nuclear reactors have been considered as targets in the past and there is no reason to believe this has changed. If al Qaeda or another terrorist organization mounts an attack against U.S. reactors from the air, on a scale similar to or exceeding the 9/11 attacks, there is an unreasonable likelihood of a serious release of radiation, either from a breach of a spent fuel cooling pond or of a reactor core itself.

The NRC's and the industry's unwavering insistence since 2001 that such attacks are both unlikely and unlikely to cause serious damage strain credulity. The present rulemaking has all the hallmarks of a backroom deal between the nuclear industry and the NRC to avoid confronting the problem. Yes, changing the rules and constructing "Beamhenge" shields around reactors would cost money. But those costs should be weighed against the cost to deal with such an attack after it occurs. Not only would the post-attack financial costs be substantial, but the industry's--and the NRC's--credibility would be shredded, dooming any possibility of a revival of nuclear power in the United States for the foreseeable future.

The government's insufficient response to hurricane Katrina last summer proves that business as usual is unacceptable. With better planning and preparations, the multibillion dollar cost of cleaning up and rebuilding New Orleans, not to mention the many deaths in that city, could have been avoided. A nuclear Katrina could be much, much worse.

It is long past time for the NRC to acknowledge that taking all prudent steps to prevent realistic terrorist attacks is not only essential but also the wisest course of action for the government and industry. The non-specificity of the current NRC proposal, which also defies congressional requirements to consider threats on the scale of the 9/11 attacks and attacks by air, does not inspire confidence. The Committee to Bridge the Gap petition should be adopted and implemented as quickly as possible.

Sincerely yours,

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