

DOCKET NUMBER
PROPOSED RULE PR 73
(70FR 67380)

43

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To: <SECY@nrc.gov>
Date: Sun, Jan 22, 2006 5:46 PM
Subject: Comments on RIN 3150-AH60

DOCKETED
 USNRC

January 23, 2006 (2:25pm)

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OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

January 22, 2006

The Secretary
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555-0001
 SECY@nrc.gov.

ATTN: Rulemakings and adjudications Staff RE: RIN 3150-AH60

Dear Staff:

I am writing in regard to the Proposed Rulemaking in regard to the Design Base Threat (DBT) to US nuclear reactors, fuel cycle facilities, and Strategic Special Nuclear Materials (SSNM).

The proposal of the Nuclear Regulatory Commission (NRC) to leave in place the security requirements imposed by the commission in 2003 is far from satisfactory. The details of the current DBT are classified. Nevertheless, it is widely believed that they refer to significantly fewer than the nineteen people directly involved in the attack of September 11 on the United States; and the Commission has not provided information that would dispel this belief.

The proposed rulemaking explicitly postpones consideration of constructing shields around nuclear plants to repel attacks by plane, such as occurred on September 11. The request for this modification by the Committee to Bridge the Gap is, in effect, brushed aside, although in 2001, representatives of both the International Atomic Energy Agency and the NRC admitted that plant containment structures were not built to withstand attacks by airliners.

The proposed rulemaking is too vague to allow meaningful comments from concerned members of the public. It also fails to carry out a demand from Congress to include attacks by large groups and attacks by air.

The NRC can hardly be unaware of the devastation that could be caused by an attack on a nuclear reactor or on its pool of irradiated fuel. The core of a 1000 MWe nuclear power reactor, typical of US reactors, contains 80 tons of fuel with a total of 5MCi of cesium 137. The typical pool contains 400 tons of fuel with 35 MCi of cesium 137. An unclassified study conducted by Brookhaven National Laboratory for the NRC in 1997 found that the median results of a fire that releases 8-80 MCi of cesium 137 would be 54,000-143,000 extra cancer deaths and \$117-566 billion in evacuation expenses as well as contamination of 2000-7000 square kilometers of agriculture land.

Nevertheless, the NRC appears to be unable to make serious provisions to prevent such an event. The agency needs to rewrite its DBT with the aim of protecting the people and the land of the United States.

Sincerely,
 Mary Davis
 Director

Template = SECY-067

SECY-02

Mail Envelope Properties (43D40B25.AF8 : 20 : 27384)

Subject: Comments on RIN 3150-AH60
Creation Date: Sun, Jan 22, 2006 5:45 PM
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Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard