

10 CFR Part 50

Docket No. PRM-50-83
Project on Government Oversight and Union of Concerned Scientists; Receipt of
Petition for Rulemaking

April 4, 2007

I am opposed to the subject Petition for Rulemaking which would require the NRC to amend its regulations to require periodic demonstrations by applicable local, State and Federal entities to ensure that nuclear power plants can be adequately protected against radiological sabotage greater than the Design Basis Threat (DBT).

Requiring licensees to perform such demonstrations seems to be contrary to the intent of defining the DBT. If there are threats greater than the DBT that are so credible that demonstrations of protection are essential, then the correct corrective action should be to redefine the DBT to encompass such additional threats.

The proposed rulemaking request is too vague about the beyond DBT threat. If this includes any force that is incrementally greater than the DBT, then this would include the situation of a DBT plus one blind man with a slingshot and a bad attitude. It would also include a well armed militia with a portable nuclear weapon. The proposed rulemaking does not express to what extent this range of threats should be evaluated. To be useful, the proposed rulemaking would have to define how far beyond the DBT protection should be demonstrated. Such definition is absent from the subject petition.

It is beyond the authority of the NRC to require participation of all appropriate entities in such demonstrations. These entities typically voluntarily participate for demonstrations, but there may well be limits to their willingness to participate. These limits could affect both frequency and depth of participation. It is essential that the best use be made of such voluntary participation. This may not occur if demonstration scenarios start reflecting less-realistic beyond DBT situations.

Are there skills required from participatory entities for a demonstration against a beyond DBT threat that would not be required for a DBT demonstration? If not, would there be any actual benefit to demonstrating protection against a beyond DBT threat? I believe that any resources that would be entailed in performing a beyond BDT demonstration would provide greater benefit by being applied to improving the performance of currently required demonstrations against the DBT.

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Template = SECY-067

SECY-02

From: Carol Gallagher
To: SECY
Date: Fri, Apr 6, 2007 9:37 AM
Subject: Comment letter on PRM-50-83

Attached for docketing is a comment letter on PRM-50-83 from Gary Arnold that I received via the rulemaking website on 4/4/07.

Carol

Mail Envelope Properties (46164D00.449 : 5 : 35764)

Subject: Comment letter on PRM-50-83
Creation Date Fri, Apr 6, 2007 9:37 AM
From: Carol Gallagher
Created By: CAG@nrc.gov

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MESSAGE	504	Friday, April 6, 2007 9:37 AM
TEXT.htm	358	
1848-0001.doc	22016	Friday, April 6, 2007 9:34 AM

Options

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Priority: Standard
ReplyRequested: No
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