

NRCREP - Docket No. 030-36974 Public Comments

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USNRC

Chief, Rules Review and Directives
Branch, Mail Stop T6-D59,
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001.

6/8/07
TR-31864
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Dear Matthew Blevins:

This email letter is being sent to comment on Docket No. 030-36974, specifically the inadequacy of the NRC response found in the appendix (http://adamswebsearch2.nrc.gov/idmws/doccontent.dll?library=PU_ADAMS^PBNTAD01&ID=071550032) which discusses safety and security in the event of a terrorist attack at the irradiating facility. In its feeble attempts to discuss (dishonestly) with the public the adequacy of security measures at all nuclear facilities in America (including nuclear reactors), but specifically the irradiating facility in question, while at the same time protecting the financial bottom lines of its licensees, security and safety are being tossed to the winds in favor of keeping financial costs down, at the detriment to human health and safety.

Let us first be honest about the woeful, and even deceitful efforts of the NRC in ascertaining true risks as associated with a terrorist attack at a nuclear facility, and speak specifically about how the NRC allowed the NEI (Nuclear Energy Institute-lobbyist for the nuclear industry) to have far to great of and influence in the process, to the extent that the DBT (Design Basis Threat) was/is of no value, as it does not prepare or require NRC licensees to be capable of defending against a terrorist attack, but instead was designed so that NRC licensees could pass the DBT's required Force On Force tests administered (sometimes) every three years.

The people of Hawaii deserve to know truth when it comes to the NRC as relates to National Security issues. They need to know that the NRC task force charged with evaluating security threats, came up with a rather extensive list of weapons that nuclear licensees needed to be able to defend against. The draft report they created was passed along to the NEI who objected to most of the weapons on said list, complaining about the great costs they would incur in upgrading their security. After much arm twisting by the NEI, and some serious lobbying, most of the weapons they objected too were REMOVED from the list.

However, the NRC staff insisted three of the weapons, including rocket launched grenades, and armor piercing bullets remain on the DBT weapons list. When the list was sent to the NRC Commissioners for final review, the NEI again went into action with a tremendous lobbying effort behind closed doors. They claimed inclusion of these three weapons would make 80 percent of their security structures (especially at nuclear reactors) obsolete. Despite the NRC staff recommendations, said weapons were DROPPED from the list.

Due to this incredibly weakened DBT, and security guidelines that have been watered down so that licensees can do security on the cheap, host communities have been, and are at risk as a result of the negligence, and even corruption on the part of the NRC. This in part and parcel explains why the NRC is so anxious to keep the effects of a terrorist attack out of the license renewal application process as relates to America's aging, failing fleet of 104 nuclear reactors. Security for the NRC takes a second seat to the financial costs of their licensees, and if something can be eliminated to save money, it is removed from consideration, even if it impinges on the over safety of a host community.

In the threat analysis , under threat, the NRC speaks of organization or person...yet, in their DBT they eliminated the likelihood that one malcontent working within the facility could easily steal the materials in question under the right set of circumstances. Further, they fail to admit that a well trained and armed group of terrorists could easily overcome the limited (rent a mall cop) security forces required at the proposed PA'INA HAWAII, LLC IRRADIATOR. In the usual fashion, the NRC admits there is a credible chance of a irradiator or nuclear reactor being attacked, but then gives the general public of a community being forced to play host to and unwanted nuclear facility a false sense of safety and security by stating there is no credible information about a specific threat on the specific facility in their backyard...it's a governmental game of Three Card Monty. Further, once the license is granted, the NRC stands for No Regulatory Control, and trust me, as one living three miles from Indian Point,

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Add = M. Blevins (MX64)

which is leaking tritium and strontium 90 into the Hudson River, I can verify this to be true...the NRC has never met a waiver from the rules they did not like.

In the appendix, the NRC fails to address what would happen if a group of terrorists, or one insider malcontent were to successfully STEAL the radioactive materials in question, whisk them away, and gain access to the materials sealed in those two stainless steel layers. What if they free the slugs of Cobalt, and begin leaving them in various public places, such as the local airport, or various tourist sites? Should such an event occur, it is very likely that Hawaii's tourist trade could suffer trillions of dollars in losses once the news was out in the mainstream media outlets, such as NRC, ABC, CNN and FOX. Even worse, what if they use the materials to build and set off a suitcase nuke? On an island, you have NO PLACE TO RUN. Evacuation will not work, and even in a sturdy brick home with a basement, you are only afforded a 40 percent level of protection if ordered to be sheltered in place. No basement? The level of protection drops to 10 percent according to the Center for Disease Control web site, but then the NRC prefers you not know that bit of information.

Even small exposures to radioactive contaminants can, over a long period of time cause cancers, birth defects, and worse, can cause young women to give birth to stillborn babies. For what? For an irradiation facility that provides a service that is questionable at best, that saves no one but large corporations a few pieces of silver. Over public objections, the NRC has relicensed (rubber stamped) 48 reactors so far, and has basically told America they intend to relicense them all regardless of public objections, or host community concerns. This irradiation facility and their license request are no different. If the majority population of the community at risk in Hawaii does not want this facility, the NRC has no business forcing it on them in the name of corporate greed, but they will! Short of massive public outcry, the NRC routinely ignores a host communities concerns and wishes.

Contrary to the NRC's conclusions, this facility would pose a risk to the citizens should a terrorist attack occur. Further, the NRC's own words state that the facility provides little if any benefit to the majority of the citizens. Lastly, when it comes to issues of security, the NRC's egregious and wantonly disrespectful disregard of public safety and security in putting together the DBT shows they CANNOT BE TRUSTED. This license needs to be denied.

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See what's free at AOL.com.

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Priority: Standard
ReplyRequested: No
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Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
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Junk Mail settings when this message was delivered

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