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Public Comments on Consideration of Aircraft Impacts for New Nuclear Power Reactor
Designs:=====

Title: Consideration of Aircraft Impacts for New Nuclear Power Reactor Designs
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General Comment: If the current 104 reactors are not going to be backfit, then why would we financially penalize any new reactors? This regulation has to apply to all or none. You cannot be half-pregnant on this issue. I recommend that this regulation apply to none rather than all.

Hitting a 104-story building is relatively easy. Hitting a much smaller reactor building is much harder, especially with a major aircraft.

Have the cockpits not already been hardened?

Do we not trust our military and homeland security to protect our critical infrastructure?

Has this change been addressed from a risk significance perspective? I would contend that the likelihood of a successful aircraft attack is extremely small post September 11, 2001. The defense in depth already exists via new airline regulations, new homeland security protections, guns in the cockpit, etc. To force more costly changes on new reactor owners for no measurable increase in protection of the population is a waste of money. The risk to the global health and safety of the public with respect to reduction of greenhouse gases using clean, affordable nuclear energy is much more important than forcing new reactor operators to be uneconomical via useless new regulation, thereby deleting nuclear energy from the mix of power solutions.

By "enhancing the facility's robustness," the NRC is sure to force future airplane attacks over to the other 104 reactors in the US thereby ensuring no measurable increase in overall protection of the public as a whole, particularly at non-greenfield

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SECY-02

sites (aka, the majority of new reactor plans).

What acceptance criteria would be used? It is going to be impossible to design for very small radiological releases. How will you independently verify? There is no way to test an undefined and asymmetric threat.

What about new larger aircraft in the future?

Would large aircraft packed with large amounts of explosives be included in the assessment?

How about multiple small aircraft packed with large amounts of explosives?

What about on-site, above-ground, used-fuel, storage facilities? How are these being protected?

What about rocket-propelled grenade attacks?

What about rogue cruise missile attacks?

Have you considered no-fly zones and/or anti-aircraft guns for physical security protection? That would seem much more beneficial for reducing the probability of radiological releases. Let's make the reactor operators terrorist killers.

Is there something wrong with using operator actions? Do we not trust the operators to do the right thing in the case of an accident? I hope not.

Have we looked at near earth orbit objects such as meteors and comets? I think that new reactors builders should consider these objects in their design also. Impact is possible; credible no, possible yes. You have to draw the line on what you are willing to consider. A commercial nuclear reactor is not a military object. It is a part of the civil infrastructure just like refineries, liquified natural gas facilities, and tall buildings. It is our military's job in conjunction with the CIA and FBI to ensure that rogue aircraft are a non-issue. To require anything more is not money well spent.

This type of regulation is being used by anti-nuclear factions as a means to make nuclear un-affordable. When it is un-affordable, it goes away. Please use common sense and reason when adopting new regulations. Let's not hold the entire industry hostage for political reasons. Fear mongering is not an effective and responsible method of regulation.

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