

The Alliance For A Clean Environment
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October 4, 2007

Richard Barkley
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, Pa 19406
610-337-5065 rsb1@nrc.gov

Re: Limerick Nuclear Power Plant Sleeping Guards / NRC's Failed Oversight

Dear Mr. Barkley,

The Alliance For A Clean Environment (ACE) is extremely concerned about security at Limerick Nuclear Power Plant, which we have repeatedly reported to NRC. Limerick's property is over 440 acres, bordered over a large distance by the Schuylkill River, and has a railroad line through the site. This nuclear plant is within a mile of Limerick Airport, and 5 miles from Pottstown Airport.

After 9/11 the National Guard kept a watchful eye on Limerick. However, that practice was discontinued. We believe there are far too few security guards for such a large threat. Even worse, Wackenhet, the security firm employed by Exelon appears incompetent.

At the Nuclear Regulatory Commission (NRC) annual meeting in Limerick April 16, 2007, ACE again expressed our concerns about Limerick security and urged Exelon to replace Wackenhet. NRC irresponsibly claimed there was no need for concern, but asked ACE to identify our specific concerns about Wackenhet in a written statement to NRC, which we did. However, NRC failed to provide an adequate written response.

The question is - why wasn't NRC concerned? Given specific security issues that were raised by ACE at NRC's April 16, 2007 meeting in Limerick, NRC should have been concerned. Examples below should have been sufficient to take concern seriously.

- Exelon's security firm has proven to be unreliable for a host of reasons identified in a report titled, "*Homeland Insecurity: How the Wackenhet Corporation is Compromising America's Nuclear Security.*" www.EyeonWackenhet.com.
- *Congressional Quarterly* reported March 11, 2006, that because of various security lapses, Wackenhet lost the contract to provide security services at the Department of Homeland Security's Washington, D.C. headquarters.

A Wackenhet security guard was caught sleeping on the job at Limerick Nuclear Power Plant (Mercury July, 2006). Exelon just fired Wackenhet at Peach Bottom for the same negligence, yet Exelon has no plans to change security at Limerick (Mercury 1/26/07). Security guards were sleeping on the job at both nuclear power plants. What is NRC going to do about this?

How can NRC justify an inspection at Peach Bottom, yet totally dismiss the same kind of incident at Limerick? In fact, ACE brought to NRC's attention April 16, 2007 the fact that workers reported anonymously to ACE that Limerick security guards were totally distracted on the job with intimate socializing. If concerned workers reported such egregious "inattentiveness to duty" to ACE, it is difficult to believe that NRC resident inspectors at Limerick were unaware of this conduct.

It's not a question of whether a disaster occurred as a result of multiple and repeated sleeping guard incidents at Limerick, Peach Bottom, and TMI. The real issue is that it could have. It would only take one terrorist attack to turn Limerick Nuclear Power Plant into a weapon of mass destruction, with devastating harmful health consequences to hundreds of thousands of people across our entire region and many hundreds of billions in financial consequences to the public. How can NRC continue to tolerate unreliable security at Limerick Nuclear Power Plant?

Please provide written responses to each issue raised above as well as the following questions.

1. How many Wackenhut security guards work at Limerick Nuclear Power Plant?
2. How many security guards work during each shift?
3. On average, how many hours of overtime do Wackenhut guards work at Limerick per day? Per week?
4. What is the highest number of overtime hours ever worked by a Wackenhut employee at Limerick per day? Per week?
5. Does NRC have a maximum permissible overtime limit for security guards at Limerick or elsewhere? If not, why not?
6. Do NRC inspectors regularly check on activities of security guards at Limerick on all shifts? Are written records kept of those inspections? If not, how can the public be assured that NRC is inspecting security activities?
7. Does Exelon take bids on security contractors? Is Wackenhut the low bidder?

It appears NRC has been negligent in its security oversight regarding "inattentiveness to duty" by Wackenhut security guards at Limerick. ACE believes that must change. Just because incidents at Limerick were not caught on tape and provided to the media as they were at Peach Bottom, is no reason to ignore the sleeping guard incident at Limerick and pretend the other "inattentive" security incidents reported by workers at Limerick did not exist. Exelon fired Wackenhut at Peach Bottom for the same kind of security negligence going on at Limerick. Why would NRC permit such unprotective inconsistency?

Incompetence on the part of Wackenhut security guards at Limerick should not be compounded by indifference on the part of NRC in a matter of such importance. It is long past time for NRC to act responsibly. The public needs and deserves written responses from NRC to all issues, concerns, and questions identified in this letter.

Thank you for your immediate attention to this urgent matter.



Donna Cuthbert
ACE Vice President

CC: Senator Specter
Senator Casey
Congressman Gerlach
Congressman Dent
Congressman Sestak
PA Senator Rafferty
PA Senator Dinniman
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Representative Hennessey
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