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PILGRIM WATCH

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RULEMAKINGS AND
ADJUDICATIONS STAFF

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Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0111

Attention: Rulemaking and Adjudications Staff

By email: SECY@nrc.gov

Pilgrim Watch Comments Proposed Rule RIN 3150-AL19

In response to the notice in the Federal Register dated October 3, 2007 (Vol. 72, No. 191, pp. 56287-56308) Pilgrim Watch submits the following comments on the United States Nuclear Regulatory Commission's (NRC) proposed rule "Consideration of Aircraft Impacts for New Nuclear Power Reactor Designs."

Pilgrim Watch endorses, adopts and incorporates the submitted comments of: Beyond Nuclear; Greenpeace USA and the Union of Concerned Scientists on the proposed rulemaking (NRC) proposed rule "Consideration of Aircraft Impacts for New Nuclear Power Reactor Designs."

In addition we add the following.

1. The proposed rule making must apply to all operating reactors and closed reactor units that have irradiated fuel assemblies in onsite pool storage structures - be subject to intentional aircraft impact hazards assessment as proposed by the rulemaking.

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SECY-02

At page 56290 of the Federal Register notice under Part II, the Commission states that all of the currently operating power reactors, together with the security program actions mandated by NRC orders as well as additional protection from the Federal, State and local authorities provide a *reasonable assurance* of adequate protection against aircraft impact and penetration. This statement is untrue.

1A. First what does "reasonable assurance" mean?

Courts Generally Require Individual Scientific Facts to be established to 95% Confidence – NRC has subscribed to this definition but failed to provide it.

The following excerpts from Citizens' Post-Hearing Proposed Findings of fact and Conclusions of law, Docket No. 50-0219-LR, ASLB No. 06-844-01-LR, October 10, 2007, 52-60 explains what reasonable assurance means.

> In the context of determining which scientific evidence to admit into court, the judiciary, supported by federal government scientists, has chosen 95% confidence as the minimum that is acceptable to prove each scientific fact in a case. For example, the Texas Supreme Court found that 95% confidence is normally the minimum necessary to scientifically prove causation:
>
> > The generally accepted significance level or confidence level in epidemiological studies is 95%, meaning that if the study were repeated numerous times, the confidence interval would indicate the range of relative risk values that would result 95% of the time. *See DeLuca v. Merrell Dow Pharms., Inc.*, 791 F.Supp. 1042, 1046 (D.N.J.1992), *aff'd*, 6 F.3d 778 (3d Cir.1993); Linda A. Bailey et al., *Reference Guide on Epidemiology, in* FEDERAL JUDICIAL CENTER, REFERENCE MANUAL ON SCIENTIFIC EVIDENCE at 153 (1994) [other citations omitted].

Merrell Dow Pharms., Inc., v. Havner, 953 S.W.2d 706, 723-24 (Tex. Sup. Ct 1997). The Texas Supreme Court in *Havner* also approved of the Texas courts' use of the 95% confidence level as the minimum level acceptable for scientific testimony:

> We think it unwise to depart from the methodology that is at present generally accepted among epidemiologists. [citations omitted]. Accordingly, we should not widen the boundaries at which courts will acknowledge a statistically significant association beyond the 95% level to 90% or lower values. *Id.* at 724.

Federal governmental scientists have also urged courts to adopt the use of 95% confidence intervals. *See, e.g., U.S. v. Chase*, 2005 WL 757259, (Jan. 10, 2005 D.C. Super). The court found credible "the testimony of the government's experts that the use of 95% confidence interval is a standard approach that is generally accepted in the scientific community." [*Id. at 6*; *See generally,* Frederika A. Kaestle, et al., *Database Limitations on the Evidentiary Value of Forensic Mitochondrial DNA Evidence*, 43 Am. Crim. L. Rev. 53 (2006)].

The Supreme Court in *Daubert v. Merrell Dow Pharmaceuticals* set the relationship between the admissibility of scientific evidence and the standard of proof required by the jury in civil proceedings. *Daubert v. Merrell Dow Pharms.*, 509 U.S. 579, 592 (1993). "Since Daubert seeks to exclude scientifically unreliable evidence, the scientific evidence must conform to the accepted convention of 95 percent probability to be admissible."

However NRC here does not provide any hard data or quantification, to establish a 95% confidence threshold that is mandated by *Daubert.*

The NJ Brief noted further that plaintiffs seeking redress through monetary damages must establish their scientific theories with greater than 95% confidence before courts will admit those theories into evidence, because that is the liability standard generally required by the scientific community. As a corollary, the cases show that a scientific conclusion that is less than 95% certain is generally not fit to present to a jury. Because a scientific assessment with less than 95% certainty would not be legally sufficient to allow a *single injured plaintiff* who has already suffered an injury to seek redress in federal court, *it cannot be sufficient to avert nuclear* accidents *that could harm thousands of people and cause devastating contamination hundred of miles away,* according to the National Academies, Safety and Security of Commercial Nuclear Spent Nuclear Fuel Storage, Public Report, April 2005.

It is essential, therefore, that the NRC prove that operating reactors, reactors not operating but have spent fuel assemblies on site and any proposed reactor is provided with reasonable assurance of adequate protection against aircraft impact and penetration at the 95% confidence level and make all documents used by NRC to support the claim fully available for independent scrutiny.

Finally, to meet the "not inimical" to public safety mandate of the AEA, the NRC must meet this standard. In point of fact NRC has accepted the 95% confidence standard and it has been applied as a measure of "reasonable assurance." NRC cannot choose where to apply it and not apply it willy-nilly.

As explained in the NJ brief, the definition of reasonable assurance has proved somewhat elusive because it is dependent on context and is a legal term, which needs to be

translated into technical terms to give it meaning and to stop it from dissolving into a meaningless platitude. An example of this translation can be found in a 2001 meeting of the Advisory Committee on Reactor Safeguards (ACRS). Transcript of ACRS Meeting (Sept. 6, 2001), Citizens' Ex. 62 at 3. The ACRS asked the NRC Staff whether a model that predicted results with 95% confidence would provide reasonable assurance. *Id.* In response, the NRC Staff confirmed that the Staff is in favor of more quantification of the term reasonable assurance and that 95% confidence in a modeled result is adequate to provide reasonable assurance:

> MR. CARUSO: Dr. Wallis, this is Ralph Caruso from the staff. . . I think that your question is what does reasonable assurance mean, and I think that the ACRS has had this discussion with the Commission in the past about what reasonable assurance means, and I don't think there has ever been any definition that everyone has agreed to. This is an eternal question that we try to deal with, and it comes out of judgment to a large extent at this point. When we can quantify it, for example, and say setting safety limit MICPRs, we try to do that. We are trying to do our regulation in a more risk-informed manner, and that is another attempt to do it in a more quantifiable way. But right now these are the words that the law requires us to use to make a finding. So those are, unfortunately, the words that we use and they are not well defined.
>
> DR. WALLIS : But the law requires you to make a finding with 95 percent confidence.
>
> MR. CARUSO: No, the law requires us to make a reasonable assurance finding.

> DR. WALLIS: If your criterion is 95 percent confidence, then the fact that they have evaluated these uncertainties enables you to make that assessment.
>
> **MR. CARUSO:** We could say that a 95 percent confidence does define reasonable assurance . . .

Pilgrim Watch notes that in the License Application of Oyster Creek regarding the ongoing corrosion of the dry well, both the reactor operator and the NRC Staff have regarded the 95% confidence level as the equivalent of reasonable assurance. The NRC Staff stated in 1991 that the reactor operator "has repeatedly claimed" that the condition of the Oyster Creek drywell "is fully understood with a 95% confidence level.

Therefore the same standard must necessarily apply to the issue at hand to demonstrate that in fact what the Commission states "that all of the currently operating power reactors, together with the security program actions mandated by NRC orders as well as additional protection from the Federal, State and local authorities provide a reasonable assurance of adequate protection against aircraft impact" is true at the 95% confidence level. Most important the complete analyses to justify the evidence must be made available to a panel of independent experts and a full and complete summary of the studies provided to the public - omitting only those portions necessary for security. A workable model of this method of disclosure was provided by the public report issued by the National Academies spent fuel vulnerability analysis, referenced above

1B. Documents from NRC and other sources contradict NRC's claim that operating reactors are adequately protected and can be exempted from further aircraft impact hazard assessment.

From Comments submitted by Beyond Nuclear:

A) NRC "Technical Study of Spent Fuel Pool Accident Risks for Decommissioning Nuclear Power Plants" (NUREG-1738) at Section 3.5.2 "Aircraft Crashes" identifies significant concern with the vulnerability of the structural integrity irradiated fuel storage pools in General Electric Boiling Water Reactors (BWRs) which by design elevate the irradiated fuel (high-level radioactive waste) storage pools six to ten stores above grade (60 to 100 feet).
NUREG-1738 states:

"Mark-I and Mark-II secondary containments generally do not appear to have any significant structures that might reduce likelihood of penetration due to other structures being in the way of the aircraft, although a crash into one of four sides may have a reduced likelihood of penetration due to other structures being in the way of the aircraft. Mark-III secondary containments may reduce the likelihood of penetration somewhat, as the spent fuel pools may be considered protected by other structures. If instead of a direct hit, the aircraft skidded into the pool or a wing clipped the pool, catastrophic damage may not occur."[1]

The technical study identifies that a direct hit on three of the four sides of the reactor building by an aircraft is likely to cause "catastrophic damage" to pools each storing hundreds of tons of intensely radioactive irradiated fuel. Catastrophic failure of the fuel pool would include not only drain away protective and cooling water coverage over the irradiated fuel, loss of configuration of the used fuel assemblies in high density storage racks and potentially the structural collapse of the walls and floor of the pool itself. The structural collapse of the pool would allow fuel assemblies to fall and congregate at various elevations of the reactor building outside of primary containment. Irradiated fuel over-spray cooling systems, if not destroyed or damaged by the aircraft impact itself, would be ineffective to prevent an exothermic reaction or zircoloy fuel fire. The resulting nuclear waste fire could potentially cause offsite releases of radiation in excess of 10 CFR 100 limits thereby jeopardizing public health and safety.

[1] "Technical Study of Spent Fuel Pool Accident Risks for Decommissioning Nuclear Power Plants," NUREG-1738, U.S. Nuclear Regulatory Commission, ML01043066, Section 3.5.2 Aircraft Crash, p. 3-23

There are 23 Mark I, 8 Mark II and 5 Mark III BWR units operating around the United States. Many of the BWRs are located amid the nation's megalopolis regions, close to major population centers including New York, Chicago, Philadelphia and Detroit.

B) NRC has publicly documented that all of the currently operational reactors (boiling water and pressurized water reactors) were not designed, constructed nor thoroughly evaluated for all hazards from aircraft impacts. According to the attached 1982 study by Argonne National Laboratories, "Evaluation of Aircraft Hazards Analysis for Nuclear Power Plants" (NUREG/CR-2859)[2], the national lab identifies to NRC that for existing reactor sites;

--the major threat from aircraft impacts on currently operational nuclear power plants come from the combined effects of aircraft impact and fire/explosion from aircraft fuel;

--it was considered not necessary that U.S. reactor containment domes be constructed to take the impact of aircraft crashes;

--a number of safety-related systems, structures and components are outside of the containment and are not protected in hardened structures;

--a number of additional ways exist in which current nuclear power plant safety can be seriously damaged by aircraft that are different from the direct impact on safety-related structures;

--the sequence of failure events as a result of aircraft impact on systems, structures and components other than hardened safety systems can result in the release of radioactive materials "far in excess" of 10 CFR 100 guidelines;

--even a very small percentage of jet fuel can create the equivalent to a large TNT blast environment;

[2] "Evaluation of Aircraft Hazards Analysis for Nuclear Power Plants," Argonne National Laboratories, NUREG/CR-2859,US Nuclear Regulatory Commission, 1982.

--fire and explosion hazards were treated by NRC and industry with much less care than direct aircraft impact leading the national laboratory to conclude that NRC claims that fire/explosion do not constitute a threat to nuclear power plants are not supported.

It is unreasonable and irrational to exclude existing reactors from being subject of the proposed rulemaking. Therefore, it is imperative that an updated state of the art aircraft impact hazards analysis be applied to all operating reactors.

C) Currently operating reactors should not be exempted from the proposed aircraft impact assessment rule because of inadequate and non-compliant safety related fire protection systems. Contrary to NRC assertions of adequate protection a large number of operating reactors are currently in violation of duly promulgated fire protection law. These long standing violations are compounded by the absence of an effective NRC enforcement policy. Therefore, currently operating reactors should go through a rigorous reassessment in context of both coming into compliance and then enhancing fire protection by the proposed aircraft rule for the hazards associated with blast and fire from fuel laden and potentially explosive laden aircraft.

Nuclear power plants are critical infrastructure targets. The consequences of a successful attack could be far reaching with unacceptable consequences. Fire protection is vital security infrastructure. Malicious use of an aircraft to cause damage to a nuclear power plant cannot be determined by through a probabilistic approach. Such actions must now be anticipated and addressed by deterministic means. Malicious acts are intentional and must be considered as pre-meditated acts by intelligent adversaries who are looking to exploit vulnerabilities to cause as much damage as they can. Those vulnerabilities must be determined and effectively addressed.

It is well documented that the nuclear power industry does not comply with current prescriptive fire protection measures for safe shutdown systems at nuclear power stations as currently required under 10 CFR 50.48, 10 CFR 50 Appendix R III.G.2 and Branch Technical Position 9.5.1. Chiefly, a variety of widely deployed fire barrier products designed and installed to protect safe shutdown electrical circuits have proven to be inoperable after dramatically failing the ASTM E-119 standardized time/temperature fire test. The violations have persisted since at

least 1989 while the number of inoperable unqualified fire barrier products has grown to include Thermo-Lag 330-1 fire barriers, FS195, Kaowool, HEMYC and MT fire barrier systems to name some.

In response to these long standing industry quality assurance failures and widespread violations of Code of Federal Regulation that prescribe the fire protection standards, industry and NRC are moving to significantly diminish the standard for requiring qualified passive design features for the fire protection of electrical circuitry vital. This electrical circuitry is vital to control room's ability to safely shutdown of the reactor in the event of fire. The industry and agency are planning to implement a compliance strategy largely through substituting "operator manual actions" for currently required qualified passive design features such as fire barriers and minimum cable separation.[3] The substitution of operator actions for qualified design fire protection features is contrary to the stated "overriding goal" of this proposed rulemaking to implement "design and other features that could provide additional inherent protection to avoid or mitigate, to the extent practical, the effects of an aircraft impact, with reduced reliance on operator actions."[4]

While NRC makes claims that operating plants are adequately protected so as not to need any further assessment under the proposed rule, this has not been demonstrated as the result of NRC repeated failures to implement and enforce the very intent of the proposed rule to make nuclear power stations more robust by qualified passive design features rather than rely on operator actions. In this case NRC clearly stands for "Not Really Consistent" in its regulatory approach to assuring the common defense.

D) All operating reactors must be included in the proposed rule for aircraft impact assessment to incorporate design features such as sustainable protective camouflage smoke screens and protective I-beam structures erected around reactor site to break up incoming aircraft. Systems

[3] "Demonstrating the Feasibility and Reliability of Operator Manual Actions in Response to Fire, Final Report," NUREG-1852, US Nuclear Regulatory Commission, September 2007.

[4] "Consideration of Aircraft Impacts for New Nuclear Power Reactor Designs," US Nuclear Regulatory Commission, Federal Register, Vol. 72, No. 191, October 3, 2007, Introduction, p. 56288.

using sustainable ground launched smoke flares such as are already deployed around German reactors to be used to obscure the target in the event of an air attack.

2. Pilgrim Watch finds no logic or rationality in NRC's decision to require new un-built designs to uphold an enhanced protective standard vital to our common defense and security, and exempt operating reactors from a required further assessment and enhancement. NRC has apparently concluded that new reactors with little spent fuel require security but old reactors with tons of spent fuel stored on site do not. Does NRC intend to paint "Please, Don't Hit Me" signs on currently operating reactors; and "Just Try to Hit Me!" on new ones?

3. Pilgrim Watch notes that the consequences of an attack demand that operating reactors and reactors with spent fuel on site be included. We know that reactors are targets. For example Dr. Jan Beyea performed for the Massachusetts Attorney General, May 2006, a consequence analysis of the estimated costs and latent cancers following the releases of Cesium-137 from Pilgrim Nuclear Power Station's spent fuel pool – a BWR, Mark I design in "America's Hometown" with a tightly packed spent fuel pool in the attic of the reactor, outside primary containment.

Estimates of Costs and Latent Cancers Following Releases of Cesium-137 from Pilgrim's Spent-Fuel Pool[5]

	10% release C-137	100% release C-137
Cost (billions)	$105-$175 billion	$342-$488 Billion
Latent Cancers	8,000	24,000

[5] The Massachusetts Attorney General's Request for a Hearing and Petition for Leave to Intervene With respect to Entergy Nuclear Operations Inc.'s Application for Renewal of the Pilgrim Nuclear Power Plants Operating License and Petition for Backfit Order Requiring New Design features to Protect Against Spent Fuel Pool Accidents, Docket No. 50-293, May 26, 2006 includes a Report to The Massachusetts Attorney General On The Potential Consequences Of A Spent Fuel Pool Fire At The Pilgrim Or Vermont Yankee Nuclear Plant, Jan Beyea, PhD., May 25, 2006.

Based on today's inventory in Pilgrim's core, a 100% Cs-137 release from the core essentially would be equivalent to a 10% release from the pool - $105-175 billion dollars in projected damages. Although, it is important to note that the curve from a 10% to 100% release is not a straight line. A smaller per-cent release of Cs-137 would be proportionately less but still very significant. And, most important, the consequence analysis by Dr. Jan Beyea focused solely on Cs-137 and only on cancer. We know that other dangerous isotopes would be released in a severe accident and other health effects expected.

An airplane attack from even a small private plane that we routinely observe flying around Pilgrim Station could cause this level of disaster - if it targeted the spent fuel pool, control room or other vital support structures. How can NRC ignore this threat when, for example, we compare the cost of the Iraq war to the estimated costs following an attack or accident at a nuclear reactor's spent fuel pool. Take Pilgrim Station, located in America's Hometown, as an example. **Cost:** The Iraq War has cost since the war began somewhat in excess of $450 billion. The cost of a 10% release of Cesium-137 from Pilgrim's spent fuel pool = $105 to $175 billion; and 100% release of Cesium 137 = $342 -$488 billion. **Deaths**: American deaths in Iraq since the war began is close to 4,000; Latent cancers from a 10% release of Cesium-137 = 8,000; and from a 100% release of Cesium-137= 24,000.

Faced with the above realities, Pilgrim Watch incorporates the remaining comments presented by Beyond Nuclear:

4. The proposed aircraft assessment rulemaking must be applied to all currently approved Standard Design Certifications but unbuilt reactors.

At page 56290 Part III Column 2, the Commission states that the currently approved Standard Design Certifications meet adequate protection requirements and do not need to meet this proposed new aircraft impact rule. These proposed exempted designs include the General Electric Advanced Boiling Water Reactor, the Combustion Engineering System 80+ pressurized water reactor and the Westinghouse AP 600 and AP 1000 pressure water reactor designs.

It is particularly egregious that prior to NRC certification of these designs the agency had published NUREG/CR-1345 "Nuclear Power Plant Design Concepts for Sabotage Protection," Volumes 1 and 2, in January, 1981 but failed to apply the knowledge of the protective strategies garnered by the Design Study Technical Support Group in its certification process for the proposed exempted new designs. This study group was comprised of representatives of Combustion Engineering, General Electric and Westinghouse. According to the Union of Concerned Scientists comments on this rulemaking those known sabotage resistant enhancements were not incorporated into the certified ABWR, System 80+, AP 600 and AP 1000 designs.

NRC now wishes to ignore or gloss over its failure to incorporate these enhancements in the certification process by exempting the designs from further aircraft impact hazard assessment or revisiting the enhancements provided in 1981.

Such irrational actions give the appearance that NRC is more concerned with cost containment for the industry rather than radiation containment in our common defense.

5) In response to the Commission request Beyond Nuclear provides comments on the following design areas:

A) The proposed rulemaking should apply the knowledge gained by previous technical design study groups such as that gained and published by NRC more than 15 years ago in NUREG/CR-1345 "Nuclear Power Plant Design Concepts for Sabotage Protection," January 1981. The agency is already aware of such design enhancements including physically separating the emergency diesel generator rooms and locating them on different sides of the reactor site, relocating the control room and irradiated fuel storage pools into more robust structures and other changes.

B) The proposed rulemaking needs to address previous criticisms made of typical aircraft hazards analyses where reasonable assurance is undermined by the lack of clear and supported statements on key underlying assumptions.

C) The proposed rulemaking needs to incorporate the comprehensive treatment of the overall hazard to include not only the impact phenomena of aircraft or aircraft missiles on substantial concrete structures but also on all potentially affected systems, structures and components. For example, aircraft impact and the resulting concussion on significant concrete structures can cause the chatter of electrical relay switches leading to the inoperability of safety-related equipment or the spurious operation of equipment that interferes with safety-related functions. The proposed rule needs to assess and safeguard against such chains of events involving non-hardened plant systems and structures such as the switchyard and the turbine hall which could lead to severe accident consequence.

D) Given that the results of aircraft impact are not just limited to the effect of the impact loads but also the potential introduction of large quantities of transient combustibles in the form of jet fuel and combustible oil, the proposed rulemaking needs to address through prescriptive passive qualified design features the protection of the control room operation of reactor safe shutdown systems by maintaining electrical circuit integrity of those systems, structures and components as currently prescribed and codified in 10 CFR 50 Appendix R III.G.1 and III.G.2 to maintain redundant electrical circuits free from fire damage by cable separation and qualified fire barriers used in conjunction with automated fire detection and suppression systems.

E) The proposed aircraft hazards assessment must consider all real consequences of aircraft impact including the spread of transient combustibles (principally aviation fuel) and the simultaneous occurrence of fire in multiple fire zones. Accompanying the high energy impact of the aircraft on the World Trade Center Tower was the release of nearly 22,000 gallons of partially vaporized aviation fuel that erupted into a fireball.

In the case of an aircraft attack on a nuclear power plant, vaporized and unburned fuel would be rapidly forced by expanding flame and pressure fronts into multiple fire zones through breaches in walls, cable tunnels, conduits, pipes and floor drainage systems into multiple areas of the plant followed by combustion. As seen in the case of the World Trade Center fire, ten floors of each of the structures were so intensely burning that steel support structures buckled followed by the progressive collapse of the entire structure; the South Tower collapse in less than one hour of

impact.[6] Even relatively small penetrations as the result of rigid projectiles off of the aircraft would allow aviation fuel to flow into containment and from one fire zone to another. NUREG-2859 calculates that 500 pounds of aviation fuel, or roughly 76 gallons, can create the blast equivalent of 1000 pounds of TNT.

F) Other real consequences of aircraft impact hazards include the effects of smoke on equipment and station personnel. Smoke can cause damage to safety-related equipment and can impede recovery operations. The technical issues discussion at page 56292 does not expressly require the fire assessments to include smoke resulting from aircraft impact.

G) Similarly for the same reason, the proposed rulemaking must additionally address through prescriptive passive qualified design features the protection of the control room operation of safe shutdown systems from the effects of aircraft impact and blast by bunkering the redundant train of electrical circuits and equipment.

H) The proposed rule must assess and evaluate effective design features that are resistant to the destructive values from an intentional attack by one and more-than-one explosive and fuel laden private aircraft.

Contrary to NRC and industry repeated assertions that other federal and state agencies actions provide an adequate level of protection, private aircraft are not subject to any of the enhanced protective actions implemented in the commercial aircraft industry including increased passenger and cargo screening, fortified cockpit doors and armed sky marshals.

Private aircraft can be enhanced as improvised explosive devices with significant impact hazards. Multiple private aircraft can be coordinated in simultaneous and/or successive attacks.

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[6] "World Trade Center Building Performance Study: Data Collection, Preliminary Observations, and Recommendations," American Society of Civil Engineers, 2002, http://www.fema.gov/library/wtcstudy.shtm

NRC documents that there are numerous operative airports and airfields within 10-miles of a large percentage of US reactors. The close proximity of these airfields if used to launch attacks using high-explosive and fuel-laden private aircraft precludes early detection through falsified flight plans and timely protective actions taken by authorizes including the air national guard.

I) The proposed rule must include assessments of design features that can camouflage the reactor sites from a line of site air attack such as through the site deployment of sustainable smoke screen launching systems.

K) The proposed rule must include assessments of design features around the reactor site that would result in the breakup an incoming aircraft before making contact with reactor system, structures and components. Such a feature has been conceptualized by Committee to Bridge the Gap's "Beamhenge" steel I-beam and steel cable structure.

Respectfully Submitted by,

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Subject: Pilgrim Watch Comments RIN 3150-AL19 Proposed Rule Air Security

Please find Pilgrim Watch Comments RIN 3150-AL19 Proposed Rule Air Security attached.

If there is difficulty in opening the document, please call Mary Lampert at 781-934-0389

Thank-you,

Mary

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