



C-10 Envisions A Clean, Safe, Sustainable,
Non-nuclear Energy Future

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

December 18, 2007

27

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

Attention: Rulemaking and Adjudications Staff

By email: SECY@nrc.gov

The C-10 Research and Education Foundation
Comments Proposed Rule RIN 3150-AL19

The C-10 Foundation endorses, adopts and incorporates the submitted comments of: The Union of Concerned Scientists, Greenpeace USA, Pilgrim Watch, Beyond Nuclear, TMI Alert, and A4NR.

It is the opinion of the C-10 Foundation in response to the notice in the Federal Register dated October 3, 2007 (Vol.72, No.191, pp.56287-56308) that the NRC has boldly abandoned it's regulatory responsibility and failed to adequately protect the public's health and safety in this new rule.

The United States Nuclear Regulatory Commission's proposed rule "Consideration of Aircraft Impacts for New Nuclear Power Reactor Designs" states: "The impact of a large, commercial aircraft is a beyond-design-basis event, and the NRC's requirements applicable to the design, construction, testing, operation, and maintenance of design features, functional capacities, and strategies for design basis events would not be applicable to design features, functional capacities or strategies selected by the applicant solely to meet the requirement of this rule."

In our opinion, this is a non-starter. It is clear the NRC has chosen to abdicate its responsibility and the primary challenge given to the agency

post-September 11, 2001. The quote below is from the NRC web-site and states the agency's mission.

"The primary challenge facing the NRC in the coming years is to emerge from the period of uncertainty in post-September 11 security requirements; determine what long-term security provisions are necessary; and revise its regulations, orders, and internal procedures as necessary to ensure public health and safety and the common defense and security in an elevated threat environment. In particular, the NRC will focus its efforts on the following activities:

Assure the continuing validity of the NRC design-basis threats.

Complete the identification of vulnerabilities and mitigating strategies at licensed facilities.

Revise requirements to provide additional protection where needed.

Develop improved methods of communicating sensitive information to licensees.

Enhance controls on high-risk radiation sources.

Develop more formal, long-term relationships with Federal, State, and local organizations with shared responsibilities for protecting nuclear facilities and activities and responding to incidents."

Respectfully Submitted,

Sandra Gavutis, Executive Director

C-10 Foundation

From: "Debbie Grinnell" <debbie@c-10.org>
To: <SECY@nrc.gov>
Date: Tue, Dec 18, 2007 1:03 PM
Subject: C-10 Foundationm's Comments Proposed Rule RIN 315o-AL19

Dear Annette,

Please find enclosed our comments for submission.

Thanks you!

Deebbie Grinnell

Mail Envelope Properties (47680B58.F72 : 5 : 8050)

Subject: C-10 Foundationm's Comments Proposed Rule RIN 315o-AL19
Creation Date Tue, Dec 18, 2007 1:02 PM
From: "Debbie Grinnell" <debbie@c-10.org>

Created By: debbie@c-10.org

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MESSAGE	97	Tuesday, December 18, 2007 1:02 PM
TEXT.htm	737	
NRC New Rule - Aircraft.doc	54272	
Mime.822	77223	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
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