

PR 52  
(72FR56287)

# COMMITTEE TO BRIDGE THE GAP

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17 December 2007

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

DOCKETED  
USNRC

December 18, 2007 (9:59am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Attention: Rulemaking and Adjudications Staff

By email: [SECY@nrc.gov](mailto:SECY@nrc.gov)

RE: RIN 3150-AI19  
**Comments on Proposed Rulemaking**

Dear Ms. Vietti-Cook:

The Committee to Bridge the Gap (CBG) opposes the Commission's proposed rulemaking to permit new reactors to be constructed without designs required to be capable of withstanding 9/11-type air attacks on sensitive reactor structures.

CBG joins in the comments submitted by the Union of Concerned Scientists, Greenpeace, and Beyond Nuclear. We also incorporate by reference the material in our Petition for Rulemaking to upgrade the NRC's Design Basis Threat regulations to require protection against air attack.

The most important defect in the Commission's proposed rule is its fundamental basis itself: that rather than *require* new reactors be designed to successfully withstand a terrorist crash of a jumbo jet into sensitive reactor structures, the Commission majority has decided instead to merely *ask* reactor vendors, "pretty please," to *consider* what design features they might be willing to include to reduce airplane crash risks.

This approach is a complete abdication of the Commission's responsibilities to assure the common defense and security and public health and safety in an era of significant terrorist risks.

Sincerely,

/s/

Daniel Hirsch  
President

Template = SECY-067

SECY-02

**From:** <CBGHirsch@aol.com>  
**To:** <SECY@nrc.gov>  
**Date:** Mon, Dec 17, 2007 11:45 PM  
**Subject:** RIN 3150-AI19

Attached please find the Committee to Bridge the Gap's comments on the NRC's proposed rulemaking that would permit new reactors to be constructed without designs capable of withstanding 9/11-type air attacks on sensitive reactor structures.

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**Creation Date** Mon, Dec 17, 2007 11:44 PM  
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MESSAGE	381	Monday, December 17, 2007 11:44 PM
TEXT.htm	577	
CBG Comments.doc	22340	
Mime.822	33315	

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