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Good evening,

I am deeply concerned about the possibility of someone deciding it would be interesting to see what would happen if an airplane was flown into a nuclear facility.

I don't believe it is a matter of IF… But more a matter of WHEN and even more importantly is WHERE does this tragic event occur.

According to a report by Robert Alverez entitled "Reducing the hazards of high-level radioactive waste in Southern California" published by Friends of the Earth…

If an airplane was successful in starting a spent fuel pool fire in one of the two cooling pools at San Onofre that burned only 30% of the pool's current contents… The radioactive release from this event would be comparable to 10 Chernobyl accidents.

The Generic Environmental Impact Study estimates the largest number of Early fatalities to be 191 people for a spent fuel accident. Latent Fatalities are estimated to be 20,000 to 27,000 people. These data points have been taken from an NRC document NUREG-1738 published in January 2001. Before September 11th, 2001, I might add.

Clearly there is a huge difference of opinion as to what could happen based upon the probability of the event occurring. I believe the NRC is very aware of the possibility of a catastrophic event occurring from a spent fuel pool fire. But they are unwilling to entertain the fact that this possibility is anything but extremely remote.

I don't understand how they can arrive at that conclusion based upon the fact that the Draft Generic Environmental Impact Statement contains the following passage:

"The NRC has determined that the probability of a successful terrorist attack on a spent fuel pool, although numerically indeterminate, is low."

There is no basis to include the last two words in the Draft Environmental Impact Statement. The two words "is low" should be omitted from the Generic Environmental Impact Statement and the NRC needs to stop using probability risk analysis when addressing the issue of terrorism in the Generic Environmental Impact Statement.

Just in case my logic went too fast for some of the audience, let me restate that if something is truly "numerically indeterminate" it is not possible to attach a number to.

So if the probability of a successful terrorist attack is truly "numerically indeterminate" then no numeric probability can be assigned to the event.

Without a numeric probability for the occurrence of a potentially catastrophic event, it is not appropriate to apply probability risk analysis to determine the risk and potential impact of a terrorist attack on a spent fuel pool.

This is mathematically hocus-pocus that is endangering the public's safety.

By allowing the NRC to choose an arbitrarily low probability of a terrorist event makes the risk of even a catastrophic event seem tolerable. Hence the loss of 191 Early Fatalities and 20,000 to 26,000 Latent Fatalities.

The problem here is that you are not only playing with people's safety and possible loss of life, which is a horrific disgrace to man kind…

The potential severity of 10 Chernobyls will impact the entire Northern Hemisphere…

It reasonable to assume that a piece of land, five times the size of New Jersey, will be turned into uninhabitable wasteland and if such an event happens in Southern California…

The event will very severely impact the entire world economy.

One last thing is for sure, if someone does figure out how to fly a large aircraft into a spent fuel pool and start a spent fuel pool fire, the damage it will do to the nuclear industry will be on par with the damage done to the surrounding environment.

If you value your jobs you need to tackle the terrorist issue head on with the following three recommendations being the least that should be done:

When decommissioning a plant, get the spent fuel relocated into secure dry storage systems as soon as the fuel is cool enough to do so.

Stop allowing the utilities to utilize dry cask systems that are not capable of protecting their contained fuel from an impact from a large aircraft. The Draft GEIS talks about storing fuel in casks for up to several hundred years. The casks need to be able to endure whatever mechanical impacts we can foresee in our current society before we pass the site on to the next seven generations.

Require that any new nuclear reactor designs be able to endure impacts from a large aircraft. Current designs of Westinghouse's AP1000 have the spend fuel pool on an exterior wall of an ancillary building that is 3 stories above the ground. Are you kidding me, this design makes it even easier for a novice pilot to strike the spent fuel pool.

I'd like to leave you with one light-hearted antidote to the current situation…

Its all fun and games until someone gets hurt.

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