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STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY
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THOMAS W. ORTCIGER
DIRECTOR

January 24, 1994

JIM EDGAR
GOVERNOR

Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Services Branch

Subject: Proposed Rule on Protection Against Malevolent Use of Vehicles at Nuclear Power Plants

The Illinois Department of Nuclear Safety (IDNS) hereby submits its comments on the proposed rule. IDNS is the lead agency in Illinois for preparing emergency plans for and, in cooperation with the Illinois Emergency Management Agency (IEMA), coordinating emergency responses to accidents at nuclear power plants.

IDNS believes NRC's Part 73 rule amendment, by addressing only land vehicles, is too narrow. The important lesson from the intrusion at the TMI plant is that of relatively easily achieved threat by terrorists to the protected areas at a nuclear power plant, regardless of access mode. Land, water, rail, air, and even topographical features, depending on their proximity to the plant, all provide access that can threaten protected areas. The margin between the current estimate of threat and the higher design basis threat, should be based on a realistic analysis of all potential avenues for terrorist threat to protected areas.

Thank you for the opportunity to comment on these proposed rule changes. If you require additional information, please contact Roy Wight of my staff at 217/785-9851.

Sincerely,

Thomas W. Ortziger
Director

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