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From: Marvin I Lewis <marvlewis@juno.com>
To: <SECY@nrc.gov>
Date: Fri, Nov 19, 2004 7:00 AM
Subject: Committee to Bridge the Gap (CBG) filed a Petition for Committee to Bridge the Gap (CBG) filed a Petition re security at NPPS.

Marvin Lewis
 3133 Fairfield St.
 Phila PA 19136
 215 676 1291
 <Marvlewis@juno.com>

DOCKETED
 USNRC

November 19, 2004 (9:29am)

Comments by email to
 the Secretary at SECY@nrc.gov
 Secretary, U.S. Nuclear
 Regulatory Commission,
 Washington, DC 20555-0001
 ATTN: Rulemakings and
 Adjudications Staff .

OFFICE OF SECRETARY
 RULEMAKINGS AND
 ADJUDICATIONS STAFF

Dear Secretary,

Please accept my comments on this rulemaking.(posted in the Federal Register on November 08, 2004, Volume 69, Number 215) for "Upgrading the Design Basis Threat Regulations for Protection Against Terrorist Attacks on Nuclear Reactors.

The petition requests that NRC upgrade the Design Basis Threat (DBT) for

U.S. nuclear power stations by: 1) revising DBT regulations to require NRC and the nuclear power industry to contemplate and prepare for (a) an attack of nuclear power stations by air and; (b) an attacking force--by land, water and/or air--at least equal to the 19 terrorists effectively coordinated in multiple teams as were the 9/11 attacks; (c) attackers utilizing a full range of potential weapons of which a group such as Al Qaeda would be capable, including heavy caliber automatic weapons, shaped charges, shoulder-fired rockets, mortars, anti-tank weapons, and large quantities of explosives; (d) a minimum of three insiders assumed to have both passive and active capacity; (e) an attack by an explosive-laden land vehicle that is not limited to the current four-wheel Sport Utility Vehicle or small truck but inclusive of a full range of larger vehicles including armored vehicles stolen from nearby arsenals and military bases and; 2) a requirement "under a time urgent schedule" for the construction of shields at reactor sites consisting of a relatively inexpensive and quick-to-assemble system of steel I-beams and steel cabling ("Beamhenge") to obstruct the angle of air attack at stand-off distances from the reactor building, fuel pool and other safety-related assets so that hijacked, rented or private aircraft (potentially carrying explosives) attempting to deliberately crash into a reactor site would be torn up in the "Beamhenge" shield effectively reducing the impact and penetration force on safety-related structures. The shield effort is focused on reasonably reducing the public's risk of terrorists successfully using nuclear power stations for radiological-enhanced sabotage.

I respectfully submit that the WTC attack is not one isolated incident. Recently deceased PA Premier Arafat used the technique of hijacking 4 planes in Africa in 1970. Innumerable planes have been used as missiles impacting buildings including an attack on the White House by

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a single engine airplane in Clinton's term. There are many suggested ways to protect NPPs from airplane collision, but the NRC has had a penchant for ignoring this danger for decades.

During the TMI#2 licensing Hearings, the Environmental Coalition on Nuclear Power had a Contention concerning the accidental collision of a airplane from the nearby Harrisburg military airport. The TMI#2 reactor was fueled at night though an emergency order so that the intervenors could not file a restraining in a timely fashion order.

Although the TMI#2 reactor was destroyed only a few months later due to an accident from another precursor and not an impact from an airplane, a more perspicacious timeline would have probably avoided the TMI#2 accident in 1979. This shows due diligence to one cause, airplane crashes, can lead to unspecified benefits, avoidance of accidents due to a lack of due diligence.

I respectfully request that due diligence is paid to the danger of airplane crashes and it is not provided as yet at many NPPs.
marv 11-19-04.

CC: <smirnowb@ix.netcom.com>, <ncohen12@comcast.net>, <shadis@prexar.com>, <kjnovak@earthlink.net>, <cwolman@mcn.org>, <dianed@nirs.org>, <rhoffman@animatedsoftware.com>, <nirsnet@nirs.org>, <sdportzline@comcast.net>, <mitchchanin@hotmail.com>, <frieda302@comcast.net>, <phyllis.peace@juno.com>, <johnsrud@uplink.net>, <dorothym@epix.net>, <bolake@hamptons.com>

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Subject: Committee to Bridge the Gap (CBG) filed a Petition for Committee to Bridge the Gap (CBG) filed a Petition re security at NPPS.
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From: Marvin I Lewis <marvlewis@juno.com>
Created By: marvlewis@juno.com

Recipients

nrc.gov

owf5_po.OWFN_DO
SECY (SECY)hamptons.com
bolake CCepix.net
dorothym CCuplink.net
johnsrud CCjuno.com
phyllis.peace CCcomcast.net
frieda302 CC
sdportzline CC
ncohen12 CChotmail.com
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