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From: shadis@prexar.com
To: "Dave Lochbaum" <dlochbaum@ucsusa.org>
Date: Thu, Oct 4, 2001 10:45 AM
Subject: Re: FW: Decommissioning SFP Security

Dave,

About downsizing security, exclusion zones, insurance, offsite planning, etc. for decommissioning plants, Maine Yankee was the stalking horse for this little industry initiative. Whipping NRC policy-makers around appears to be little more than light exercise for Entergy's licensing people. Early partial site release, though it segments a significant federal action, is another of their gems.

About spent fuel pools with no defensive perimeter.

Three terrorists could blow into the SFP building with a 4-wheel drive (or maybe their mom's Plymouth Reliant K-car), kill or capture the sfpb guards in their station, secure the building and hold off the 7th cavalry while the terrorists take their time to blowup/blow out the fuel transfer tube and dividing weir and then lower a half ton or more of thermite onto the fuel. Or sheets of formable explosive could be lowered into the pool between the racks and the pool walls; bunching and folding under the edge of the fuel racks to blow fuel up and out of the sfpb. Or, given these fundamentalist Muslim boys seem willing to sacrifice their lives anyhow, a simple come-along could be used to retrieve a half dozen assemblies from the pool to be wrapped with a half ton of TNT. The key in this scenario is that NRC abandoned the notion of preventing access to the fuel in favor of the notion that a terrorist's game could be interrupted before they have time to do anything serious. This goes for ISFSIs as well.
!Que estupido!

It is a shame that terrorists just may not agree to behave as we plan for them to behave. Many of them have probably not read NRC's list of "approved" target sets. If anyone at NRC suggests that we need to be reasonable or that we need to restrict ourselves to analyzing threats based on assumptions held prior to 9/11, just wave your box-cutter at them.

I believe the NYC Police Commissioner had it close to right when he said last week that, "We have to somehow get ready for the unimaginable." NRC needs to dialogue with host communities and nuclear safety advocates about the risks and potential consequences of stashing, willy-nilly 100's of tons of waste fuel at sites in populated areas.

Friends of the Coast has invited Commissioner Merrifield, as well as Maine Yankee, to participate in our November 13th Forum.

I will be filing a petition with NRC on safeguards and security on behalf of the New England Coalition, hopefully on Monday.

Ray

PS: Have you considered not eating in the NRC cafeteria any longer? I mean, most NRC staff seem to be able to stomach almost anything while making no telltale noises audible to the unsuspecting public.

----- Original Message -----

From: Dave Lochbaum <dlochbaum@ucsusa.org>

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11/4

To: <shadis@prexar.com>
Cc: <ALM@nrc.gov>; <gmt@nrc.gov>
Sent: Thursday, October 04, 2001 8:20 AM
Subject: Fwd: FW: Decommissioning SFP Security

Hello Ray:

I'm forwarding you a very disturbing response Paul Blanch got from the NRC's Stuart Richards. Paul had asked the NRC about the practice of considering spent fuel pools to be non-vital areas after nuclear plants permanently shut down. Richards confirmed Paul's suspicions that this was indeed the case.

As you know, security at operating nuclear power plants is provided through the establishment of three layers: (1) the owner-controlled area, which is essentially the property line, (2) the protected area, which is defined by the perimeter security fence and requires individuals to pass through security to enter, and (3) the vital area, which requires individuals to have special authorization to access.

You'll note that Richards claims, for some reason, that the spent fuel pools at decommissioning nuclear plants can be considered non-vital areas because the zirc fire is a "beyond design basis" event. That is a "beyond logic conclusion."

10 CFR 73.2 has the following definitions:

Vital area means any area which contains vital equipment.

Vital equipment means any equipment, system, device, or material, the failure, destruction, or release of which could directly or indirectly endanger the public health and safety by exposure to radiation. Equipment or systems which would be required to function to protect public health and safety following such failure, destruction, or release are also considered to be vital.

The NRC study on spent fuel pool risk released internally last October and externally this February shows how many people could be killed and hurt when the lethal radioactivity in the spent fuel gets to the atmosphere.

10 CFR Part 73 contains security requirements for nuclear plants, whether they are running or not. By reclassifying spent fuel pools from vital when the plant is operating to non-vital when the plant is permanently shut down, the NRC is saving plant owners money at the increased risk to the people living nearby. It is appalling. The agency, which is supposed to be the public's guardian, is simply ignoring these federal regulations to save plant owners a few dollars.

The NRC has made it much, much easier for someone, or a small band of someones, to sabotage the spent fuel stored at decommissioning nuclear power plants.

I congratulate the Friends of the Coast for arranging the event on

November 13th. As your efforts proved five years ago, the NRC will not address this safety issue at Maine Yankee without public outcry.

Take care,

Dave

CC: <ALM@nrc.gov>, <gmt@nrc.gov>