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USNRC

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Subject: Re: NRC Proposed Rulemaking (RIN 3150-AH60)

January 23, 2006 (2:25pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Re: NRC Proposed Rulemaking (RIN 3150-AH60)

January 22, 2006

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This Transmission Constitutes a Submission of Comments to NRC on Upgrading of DBT

It is an imperative that the NRC security requirements, at minimum, include the following five upgrades:

- (1) The ability of nuclear power plants to fully defend against an attack of the magnitude of 9/11; i.e., 19-20 attackers, attacking a nuclear facility in a coordinated, multi-directional, multi-team attack.
- (2) The ability of nuclear power plants to defend against attacking forces coming by land, water and/or air.
- (3) The ability of nuclear reactors, spent fuel pools and other critical on-site structures to withstand attack by aircraft (including fully-fueled large commercial airplanes and small airplanes or helicopters laden with explosives) as well as the potential aftermath of a massive fuel conflagration.
- (4) The ability of all critical plant structures (including physical security barriers) to withstand an attack by an explosives-laden land vehicle (with the meaning of the term "vehicle" being inclusive of a full range of large vehicles).
- (5) The ability of the plants to defend against attackers utilizing the full range of potential weapons that terrorists are known to be capable of using, including heavy caliber automatic weapons, sniper rifles, shoulder-fired rockets, mortars, anti-tank weaponry, bunker busters, shaped charges, rocket-propelled grenades, high-power explosives, and chemical weapons, as well as cyber-attacks.

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