

RulemakingComments Resource

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To: RulemakingComments Resource
Subject: [External_Sender] Docket ID NRC-2014-0118 Comment

Enhanced Security of Special Nuclear Material (proposed by the Nuclear Regulatory Commission on 03/01/2019). The objective of the rule is to update special nuclear material (SNM) physical protection requirements for fuel cycle facilities, nuclear plants, and spent nuclear material. These security requirements would be similar to the ones issued by the NRC following the terrorist attacks of 9/11.

Comment:

After reading about this rule and how some companies/people have commented on its possibility, I find that there are many pros and cons to the application of this rule. The biggest cons would to this situation would definitely be the spending required to maintain a high level of security for these facilities, which would lead to a number in the millions.

However, one of the many pros that this rule could bring is an increase in security-like appearance that could and would essentially keep these facilities safe from potential trespassers or negligent visitors/workers. Similarly, with the ongoing development of technology, cyber attacks should also be kept on the radar, as it would be very alarming, although quite difficult, for an individual or a group to have access to the system and be able to manipulate controls over nuclear reactors, which could lead to damages and off-site release of radiation. In addition, if a nuclear plant becomes the target of a potential terrorist attacks, the impacts could be devastating to nearby cities and towns mostly due to radiation. After the events of 9/11, the NRC and IAEA (International Atomic Energy Agency) mentioned that "U.S. nuclear plants were not designed to withstand such an impact". Through these arguments, it would be best to maximize the security of these fuel cycle facilities to prevent the possible events of one of these scenarios happening. While it may be unlikely that these scenarios do eventually occur, as some arguments might say it is unbelievable or unthinkable, it would be best to not wait until they do happen and take the necessary precautions as soon as possible. After all, no one expected the events of 9/11 to happen the way they did.

Thank you for your consideration,

Louis Wai-Choon