

Nuclear Regulatory Commission Proposed Rule 10 CFR Part 73: Design Basis Threat

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The proposed rule's principal objective is to define in NRC regulations the level of security necessary to ensure adequate protection of public health and safety and common defense and security, as stated in the proposed rule. The NRC premise to determine the Design Basis Threat is limited to "a determination as to those characteristics against which a private security force could reasonably be expected to provide protection". The C-10 Foundation finds the NRC premise fundamentally flawed and dangerously inadequate. Therefore, the basic premise for a proposed rule by the NRC is obviously inadequate to protect the public's safety or our nation's common defense and security.

Furthermore, the NRC security plans for our nation's nuclear power plants are not site-specific and is only paper reviewed. This is a grossly inadequate security plan design and lacks the vigilant NRC oversight that the seriousness of the current security threat poses after the event of September 11, 2001. Regretfully, it is our position that the NRC's proposed rule: Design Basis Threat continues to be a dangerous and unacceptable disservice to the American public.

The C-10 Research and Education Foundation has stated since the events of September 11, 2001 that nuclear power plant security must be federalized. We continue to recommend that independent, highly reliable and respected academic institutions free of any bias should conduct the vulnerability assessments. Scientific integrity could not be a more vital criteria in determining the characteristics required to adequately determine the design basis threat to the American public from a terrorist attack to a nuclear power plant.