



NUCLEAR SECURITY COALITION

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Alliance for Nuclear Accountability
Alliance for Nuclear Responsibility
C-10
Cape Downwinders
Citizens Awareness Network
Citizens Campaign for the Environment
Citizens' Environmental Coalition
Citizens' Regulatory Commission
Citizens Resistance at Fermi II
Clean Water Action
Earth Care
EFMR Monitoring
Environmental Coalition on Nuclear Power
Finger Lakes Citizens for the Environment
Georgians Against Nuclear Energy
Greenpeace
Heart of America Northwest
Independent Environmental Conservation &
Activism Network
Institute for Resource and Security Studies
Justice Through Peace Initiative
Kids Against Pollution
Lakeshore Environmental Action
Massachusetts Citizens Awareness Network
Massachusetts Public Interest Research Group
Nebraskans for Peace
New England Coalition on Nuclear Power
New Jersey Public Interest Research Group
North American Water Office
New York Public Interest Research Group
North Carolina Waste Awareness & Reduction
Network
Nuclear Energy Information Service
Nuclear Free Vermont
Nuclear Information & Resource Service
People's Environmental Network of New York
Physicians for Social Responsibility
Pilgrim Watch
Plymouth County Nuclear Information Committee
Public Citizen
Riverkeeper
San Luis Obispo Mothers for Peace
Sierra Club
Southern Alliance for Clean Energy
Syracuse Peace Council
Three Mile Island Alert
Union of Concerned Scientists
UNPLUG Salem
Vermont Citizens Awareness Network

March 16, 2005

Dr. Nils J. Diaz, Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Chairman Diaz:

The Nuclear Security Coalition is a consortium of independent organizations that serve the public interest. We share a concern that civilian nuclear facilities in the United States are inadequately protected against attack.

Many public officials across the nation also share this concern. A recent illustration is a set of written comments submitted to the NRC on January 24, 2005, by the Attorneys General of New York, Illinois, Connecticut, Arizona, California, Wisconsin and Arkansas, in support of upgrading the standard for defending nuclear power plants against terrorist attack. The comments included the statement:

“The NRC must upgrade the design basis threat to require nuclear power plant owners to defend against attacks that terrorists can realistically be expected to be able to carry out. Determining the full scope of such threats will require the advice of experts on terrorism and security, an opportunity for public comment and careful consideration. At a minimum, the upgraded design basis threat should require defenses against attacks by air, water or land, and by groups at least as large as that involved in the 9/11 attacks.”

On August 10, 2004, the Nuclear Security Coalition submitted a petition to the NRC requesting actions to provide stronger defenses of boiling-water reactors (BWRs) with Mark I & II containments and their spent fuel. The petition's focus reflected our concern about the particular vulnerability of the Mark I & II BWRs, notably the placement of their spent-fuel pools high above the ground. This focus does not imply that the vulnerability of other commercial reactors is less deserving of attention.

The NRC has taken no action on our petition. Based on our longstanding observation of the NRC, we will not be surprised if the NRC eventually dismisses our petition without a considered response to the detailed points that we have made. Similarly, we will not be surprised if the NRC takes no substantive action to address the concerns expressed by the above-mentioned Attorneys General in their

recent comments. Thus, added to our concern about the vulnerability of civilian nuclear facilities to attack is a growing concern that the NRC cannot be relied upon to protect the citizens of the United States from this grave threat.

In an effort to dispel our concern that the NRC cannot be relied upon to protect citizens, we hereby request a meeting directly with the NRC commissioners. The meeting would be a public event. Presentations would be made on our behalf by representatives of the Coalition. Commissioners would be welcome to ask questions or make comments, at their discretion. We recognize that the NRC must operate according to statutes and regulations, and believe that our request is consistent with that legal framework. The event would directly provide the NRC commissioners with information that might not come to their attention through other channels.

Thank you for your attention. If you have questions or to arrange a meeting, please contact Dr. Gordon Thompson at (617) 491-5177 or irss@igc.org.

Sincerely,

Dr. Gordon Thompson
Executive Director
Institute for Resource & Security Studies

David Lochbaum
Nuclear Safety Engineer
Union of Concerned Scientists

CC: Commissioner Edward McGaffigan
Commissioner Jeffrey Merrifield
Commissioner Gregory Jaczko
Commissioner Peter Lyons