

COMMITTEE TO BRIDGE THE GAP

605 WALDEBERG ROAD
BEN LOMOND, CA 95005
(831) 336-8003

17 December 2007

Ms. Annette Vietti-Cook
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0111

Attention: Rulemaking and Adjudications Staff

By email: SECY@nrc.gov

RE: **RIN 3150-AI19**
Comments on Proposed Rulemaking

Dear Ms. Vietti-Cook:

The Committee to Bridge the Gap (CBG) opposes the Commission's proposed rulemaking to permit new reactors to be constructed without designs required to be capable of withstanding 9/11-type air attacks on sensitive reactor structures.

CBG joins in the comments submitted by the Union of Concerned Scientists, Greenpeace, and Beyond Nuclear. We also incorporate by reference the material in our Petition for Rulemaking to upgrade the NRC's Design Basis Threat regulations to require protection against air attack.

The most important defect in the Commission's proposed rule is its fundamental basis itself: that rather than *require* new reactors be designed to successfully withstand a terrorist crash of a jumbo jet into sensitive reactor structures, the Commission majority has decided instead to merely *ask* reactor vendors, "pretty please," to *consider* what design features they might be willing to include to reduce airplane crash risks.

This approach is a complete abdication of the Commission's responsibilities to assure the common defense and security and public health and safety in an era of significant terrorist risks.

Sincerely,

/s/

Daniel Hirsch
President

