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