

# GREENPEACE

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March 2, 2004

Chairman Nils J. Diaz  
Commissioner Jeffrey S. Merrifield  
Commissioner Edward McGaffigan, Jr.  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Chairman and Commissioners:

I am writing to draw your attention to a report produced by the German nuclear safety institute, which concludes that no nuclear reactor could withstand a September 11<sup>th</sup> type attack. This report contradicts the propaganda circulated by the Nuclear Energy Institute and others in the nuclear industry in the wake of the attacks on the World Trade Center and the Pentagon.

Entitled "Expert Analyses of Terrorist Scenarios for Aircraft Crashes on German Nuclear Power Plants," the report was written by the Gesellschaft fuer Anlagen- und Reaktorsicherheit (GRS), Germany's central expert institution in the field of nuclear safety. The summary, which was prepared by the Federal Environment Ministry, is dated November 2002.

The GRS divided all German reactors into five categories, according to their vulnerability to an attack with a passenger aircraft. While none of the reactors were considered to be immune to an attack, five of Germany's older reactors were found to have little or no chance of surviving such an attack. Greenpeace has made a translation of the summary, which we have enclosed.

As a result of the GRS report, Mr. Wolfram Koenig, Head of the German Federal Office for Radiation Protection has called on reactor operators in Germany to close down the five most vulnerable reactors. The findings of the GRS confirm research commissioned by Greenpeace in the immediate wake of Sept. 11<sup>th</sup> (1).

Since U.S. nuclear reactors maybe similarly unable to withstand an airliner attack directed against them by terrorists or during warfare, we urge you to study the GRS results in detail and act upon them immediately. At the very least, the German study should prompt the NRC to thoroughly analyze the vulnerabilities at existing nuclear facilities. Given the NRC's recent experience at Davis Besse, where ignoring international operating experience and a report submitted by Greenpeace contributed to the worst accident precursor since the meltdown at Three Mile Island, we hope that the agency will be more circumspect in its treatment of this analysis.

I look forward to your response and comments about the GRS findings at your earliest convenience.

Sincerely,

James Riccio  
Nuclear Policy Analyst  
Greenpeace

Hirsch, Helmut [Danger to German nuclear power plants from crashes by passenger aircraft](#). Report commissioned by Greenpeace Germany. Hannover, November 2001.