RAS 3355

STATE OF UTAH

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August 27, 2001

Emile L. Julian, Assistant for
Rulemakings and Adjudications
Rulemakings and Adjudications Staff
Office of the Secretary
U.S. Nuclear Regulatory Commission
11555 Rockville Pike, One White Flint North
Mail Stop: O16G15
Washington, D.C. 20555

Re: In the Matter of Private Fuel Storage, LLC, Docket 72-22

Dear Mr. Julian;

Enclosed is the original signature page and two copies from the declaration of Dr. Marvin Resnikoff (August 16, 2001), the faxed copy of which was filed in conjunction with State of Utah's Response to Applicant's Motion for Summary Disposition of Utah Contention W (August 16, 2001).

Thank you.

Sincerely,

Karma Pathakis,
Lead Secretary

Enclosure: as stated
cc: PFS Docket 72-22-ISFSI Service List, without enclosure

Template = SECY-018

SECY-02

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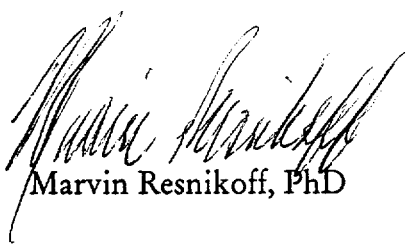
16. PFS has not provided any documentation that shows the height of its railcar flatbed will in fact be less than four feet. If PFS uses a steerable trolley for the railcar,[2] then the deck height of a railcar with a steerable trolley may be higher than the height of a standard flat bed railcar. No design materials have been given to the State during discovery. Thus, the deck height is currently unknown.

17. Even assuming that PFS' railcars will have a four foot or less deck height, the actual drop distance will exceed the forty-inch test. Additionally, the cask and cradle lay on the railcar deck. The height of the cask is raised twenty-two inches above the cradle due to the impact limiters.[3] Thus, a cask/cradle dropped directly from a railcar could be dropped at least 70 inches. Use of a steerable trolley may increase the drop distance further. *See* ¶ 16 *supra.*

18. If the crane tips over, for example during an earthquake, while lifting the combined cask/cradle, the cask/cradle could be dropped horizontally from a height greater than the 70 inches. Under this scenario, the employment of a steerable trolley may increase the drop distance further. *See* ¶ 16 *supra.*

19. PFS has not analyzed the impacts of flooding at the intermodal transfer facility if a cask is dropped during an earthquake. Thus, a cask/cradle combination from a height exceeding 40 inches onto an object could be sufficient to penetrate the shipping cask and damage the fuel cladding and cause a radioactive release during a flood at the intermodal transfer facility.

Executed this 16th day of August 2001,

By 
Marvin Resnikoff, PhD

[2] *See* Applicant's Response to State of Utah's Request for Admission of Late-Filed Contentions LL-OO (August 30, 2000) at 11.
[3] Holtec, HI-STAR TSAR, HI-951251, Rev. 8 (June 25, 1999), Docket No. 71-9261, Section 1.4, Drawing 1765, No 4 of 7.