

RAS 3389

STATE OF UTAH
OFFICE OF THE ATTORNEY GENERAL



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USNRC

September 13, 2001 (5:48PM)

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September 6, 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. Farhang Ostadan (August 22, 2001), the faxed copy of which was filed in conjunction with State of Utah's Second Request to Modify the Bases of Late-filed Contention Utah QQ in Response to More Revised Calculations from the Applicant (August 23, 2001).

Thank you.

Sincerely,

Jean Braxton,
Legal Assistant

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

Template = SECY-018

SECY-02

10. Holtec assumed an idealized and favorable condition to model the sliding of the pad over the soil. It has simply ignored the effect of soil-cement around the pad and the unsymmetric loading that the soil-cement will impart on the pad once pad undergoes sliding movement. The cement treated soil will create an active and a passive side. The cracking and potential crushing of the soil-cement on passive side and separation of the soil cement on the active side due to lack of tensile capacity of soil cement will impart unbalanced forces on the pad and severely impact the stability of the casks on the pads.
11. In my opinion it is clear the Applicant has not formulated a sound design concept that can properly include the real behavior of the cement-treated soil on the seismic response and stability of the cask-pad system. In its calculations, the Applicant ignores or uses cement treated-soil on an as-needed basis.

Executed this 22nd day of August, 2001.

By: Farhang Ostadan
Farhang Ostadan, Ph.D., P.E.