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03-110-LB (L)

March 18, 2003

Dr. Andrew J. Murphy, Director
Office of Nuclear Regulatory Research
Mail Stop T-10-D-20
U.S. Nuclear Regulatory Commission
Washington D.C. 20555-0001

Constructive Comments

Dear Dr. Murphy:

Among the many questions and issues raised at the March 12 and 13, 2003 workshops in Las Vegas and Pahrump, several involved technical matters, your evaluation of which will help us in preparation of constructive comments by the May 30, 2003 deadline. I would greatly appreciate your thoughts as to how these should be addressed--in personal communication, in exchange of memoranda or letters, etc.

Briefly noted, these matters include:

- Inclusion or exclusion of impact limiters (in the rail cask test). As we understand, including limiters produces results regarding the transportation "package," not the cask itself. Excluding limiters provides a tougher but arguably less realistic test.
- Inclusion of a puncture test after the extra-regulatory impact test and before the extra-regulatory fire test. Are there technical "pros" and "cons"? For example, might we learn something from a puncture test following a severe impact? Might the puncture test compromise results from the fire test?
- Full-scale tests involving casks with transport equipment. Might this complicate findings regarding the cask itself?
- Test to failure. Would such tests follow the extra-regulatory impact test, the (possible) puncture test, and the extra-regulatory fire test? Would/could further testing at that stage produce useful data--that is, data relevant to the modeling of performance under extreme conditions?
- Testing used casks and cask components. Does this imply an ongoing full-scale cask-testing program, in which a cask is occasionally pulled from the fleet for fullscale testing? Could such testing be done in a way that the cask could be returned to the fleet? Might such tests require tests of other such casks in the operating fleet?
- The existing NRC cask-monitoring program. I believe NRC indicated that it "monitors" cask performance, but we are not clear how you do so. Do the casks

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degrade in use? If so, at what rate, due to what key causes, regarding which key components? When should casks be retired? When they no longer meet certification standards? When they no longer meet standards by a certain (e.g. 5 times) margin? When any component no longer meets such standards?

Your summary of the technical "pros" and "cons," in whatever convenient form, will help us in preparation of what we hope will be constructive and useful comments.

Respectfully
NYE COUNTY, NEVADA

 for

Les W. Bradshaw
Department Manager

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