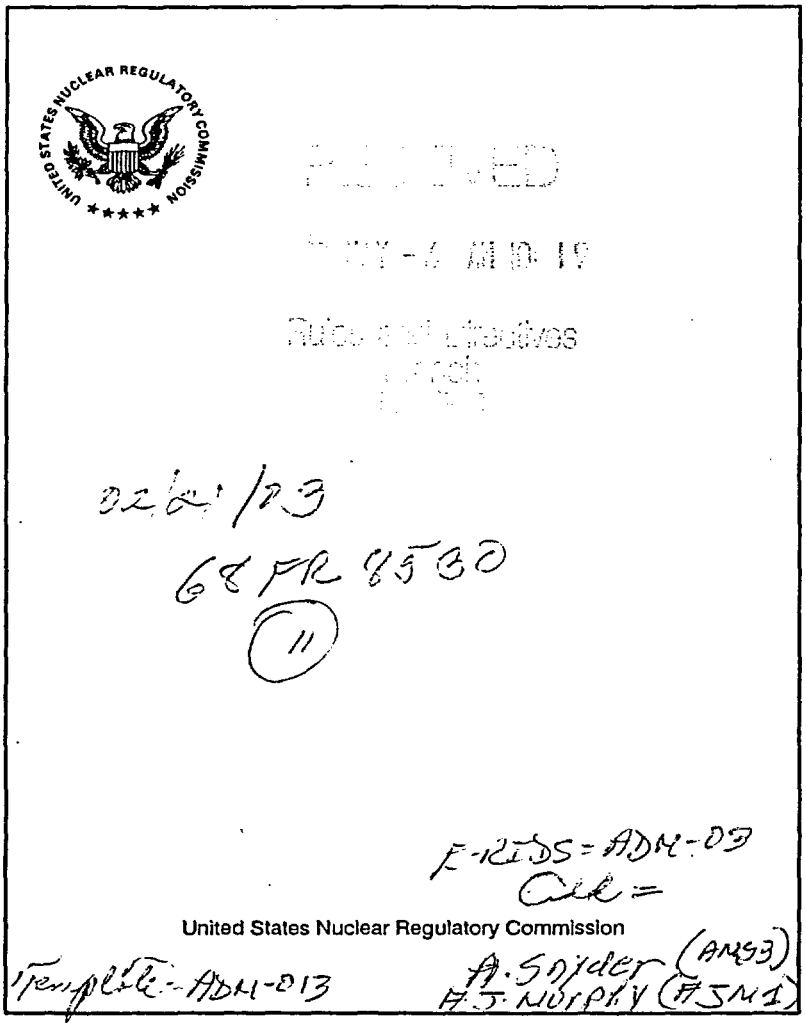

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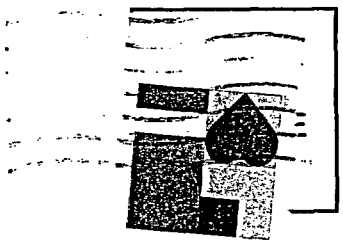
A. Snyder (AMS3)
A.J. Murphy (AJM1)

FROM:

Evelyn A Roche
1530 Silver Eagle Dr
Elko, Nevada 89801



Chief, Rules Review and Directives Branch
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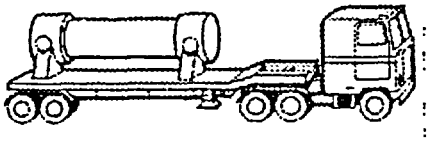

Comment Regarding
Package Performance Study Test Protocols

I want to see:

- The NRC commit to changing the licensing procedures as needed to address any shortcomings that arise out of the full-scale tests it conducts, which include puncture, crush, and 1450°F (> 1hour) fire tests.
- Full-scale testing to failure (radionuclide release or compromised shielding) to determine the physical limits of the casks.
- A comparison of stresses applied to the cask during the most severe credible accident to the experimentally determined failure limits.
- In general, full-scale physical testing for any cask design to be used for HLW/SNF transport.

I do **not** want to see:

- The full-scale tests advertised or implied by the DOE or NRC as regulatory tests, or claim, explicitly or implicitly, that the tests satisfy the public demand for full-scale testing of casks if the tests are not the regulatory tests.
- Computer models used for regulatory licensing.
- The PPS become a public relations campaign for the NRC solely to instill public confidence in the NRC and HLW/SNF transport.