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Rules and Directives
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E-CFDS-AD4-03

United States Nuclear Regulatory Commission

(A5M2)

Template = AD4-013

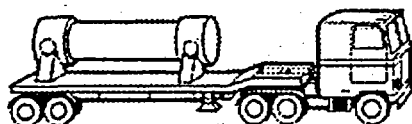
Call = A. Snyder
(A5M3)

FROM:

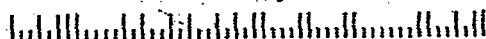
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Chief, Rules Review and Directives Branch
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Comment Regarding
Package Performance Study Test Protocols



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 (> 1 hour) 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.