



RECEIVED

2RD MAY 15 AM 8:46

Rules and Directives
Branch
USNRC

4/21/03

68 FR 8530

41

R-RIDS=ADM-03

Att. = A. Snyder (AMS3)

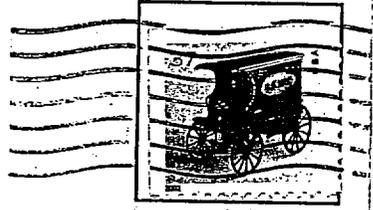
United States Nuclear Regulatory Commission

Template = ADM-013

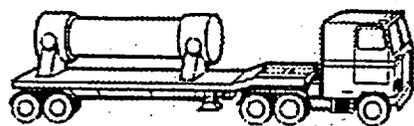
A. J. Murphy (AJM1)

FROM:

Denton Gehr
645 Georgia Place
Reno, NV 89509



Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-6-D-59
Washington, DC 20555-0001



**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 should include puncture, crushing force, 1475° F fire for at least one hour, and deep immersion.
- The NRC conduct tests using high explosives and penetrating projectiles to assess risks of a terrorist attack.
- Full-scale testing to failure (radionuclide release or shielding compromised) 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.
- Computer modeling used only to improve cask designs.
- 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 unless the tests are the regulatory tests.
- The DOE or NRC claim, explicitly or implicitly, that the test 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 in an attempt to instill public confidence in the NRC and HLW/SNF transport.

Signed

Denton Gehr