



**ECOLOGY CENTER  
OF SOUTHERN CALIFORNIA**

P. O. BOX 351419, LOS ANGELES, CA 90035-9119 • TELEPHONE (310) 559-9160

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Rules and Directives  
Branch  
USNRC

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May 2, 2003

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

Draft NUREG-1768

Dear Sir/Madam,

In response to your Draft NUREG-1768, the nationwide members of the Ecology Center feel that:

- \* NRC should make full-scale physical testing to failure a licensing requirement for every cask design. (Currently the agency relies mainly on computer modeling).
- \* NRC now suggests subjecting just two cask designs to "extra-regulatory" full-scale physical tests. At the very least, the agency should test every cask design proposed for shipments to Yucca Mountain and Private Fuel Storage projects.
- \* NRC proposes only fire and crash tests. The testing regime should be expanded to include puncture, crushing force, and deep immersion tests.
- \* NRC's proposed tests will not evaluate cask vulnerability to attack. NRC should expand the testing regime to include the explosive and missile attacks.
- \* NRC should test full-scale casks, not just scale models.
- \* NRC should test casks to failure, not just to arbitrary standards.
- \* The surest way to reduce nuclear waste transportation dangers is to limit the number of shipments!

We expect meaningful stake holder input and participation from all affected areas (proposed routes) in development of testing protocols, selection of test facilities, and personnel, and reevaluation of NRC cask performance standards. We further expect full scale testing to failure of casks PRIOR to NRC certification. This would include every cask model used; casks selected at random; in real world accident/attack situations; testing ALL possible shipping scenarios (train, truck, barge, etc.); and scenarios that "could never happen" We also expect openness and transparency and public and media oversight of all tests.

You are dealing with quality of life, and even life itself, issues, and the public has a right to know what is in store for us. Keep us informed

Sincerely,  
*Anna Harlowe*  
Anna Harlowe  
Issues Coordinator

FRIDS = ADM-03  
Cde = A. Snyder (AM53)  
A.S. Murphy (AS41)

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