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Rules and Directives Branch USNRC

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Chief, Rules Review and Directives

U.S. Nuclear regulatory Commission

Mail Stop T-6-D-59
Washington, DC 20555-0001

Dear Sir or Madam:

The Prairie Island Indian Community submits the following comments in regard to the US Nuclear Regulatory Commission's (NRC) proposed Package Performance Study (PPS) and draft NUREG document (NUREG-1768). For your information, the Prairie Island Indian Community interest in the PPS arises from the location of a commercial nuclear power plant (the Prairie Island Nuclear Generating Plant) located within 600 yards of our homeland. We are very interested in the safe removal and transportation of spent fuel from the power plant to the proposed national repository at Yucca Mountain. Because of our interest and concerns, we sent a representative to the Package Performance Study roundtable stakeholder workshop in Rosemount, Illinois. Based on that workshop and other materials on the PPS, the Community offers the following comments:

- Funding for the implementation of the PPS was cited numerous times during the workshop as a primary driver of the scope and scale of the study. A cost estimate between twenty and seventy million dollars was discussed, with the upper end being most preferable. Exposure of the spent nuclear fuel to a variety of hazards will be greatest during the transportation process. Therefore, full funding of the PPS is paramount to a successful and robust study program and is supported by the Prairie Island Indian Community.

- There are numerous rail and truck casks certified by the NRC. Each of these casks has different designs with different stress reaction characteristics. All current NRC certified cask designs anticipated to be used in the transportation of spent nuclear fuel should be subjected to these tests.

- During the workshop there was discussion of speeds that should be used in the drop test for the casks. A point was made that currently any train passing another with spent nuclear fuel was required to come to a complete stop when the two trains passed each other. Another participant indicated that rule had been suspended. If indeed the rule was suspended and these trains are no longer required to follow this protocol, we

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believe that an appropriate speed that would simulate a collision of these trains would be appropriate. To simulate the drop test onto an "unyielding" surface, we understand that the casks will be dropped onto a concrete block approximately 30 feet by 30 feet and that will be covered by a twelve inch steel cap. While we also understand this is a situation that would rarely be found in natural conditions, a stated goal of this project is to gain public confidence. Testing these casks outside the limits of a "normal" situation would certainly help to accomplish that goal.

- The level of realism used in the testing is critical. In the simulated fire tests, the structural integrity of the cask was fully intact. Multiple insults to a single cask during a crash event is a very plausible scenario, therefore conducting these events in sequence to these casks will give a "real world" performance indication. Monitoring test impacts on the cask seals, and not just the center, would be primary. We believe the seal area would be compromised first during an accident.

- Finally the NRC has stated that they do not plan to alter cask certification requirements. What steps is the NRC willing to take if the results from the PPS show that the existing regulatory requirements are not adequate?

Thank you for the opportunity to submit these comments on the proposed Package Performance Study. We look forward to the implementation of the study and will continue our involvement in the process.

Respectfully,

Audrey Bennett, President

Victoria Winfrey, Assistant Secretary/Treasurer

Vice President
Vacant

Darelynn Lehto, Secretary

Alan Childs, Sr., Treasurer

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