



RECEIVED

200 JUN -2 AM 9:08

Rules and Directives
Branch
10/20/04

4/21/03
68 FR 8530

94

F-RID-S-ADM-03

Adm - A. Snyder (ADM3)

United States Nuclear Regulatory Commission

Temple = ADM-013

F. J. McPhee (ADM3)

FROM:

DAVID BUCH, OFA
1420 BARTLETT AVE.
LAS VEGAS, NV
89106



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 (radioisotope 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

David Buch