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Rules and Directives  
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E-RTDS = ADM-03  
Cde = A. Snyder (AMS3)

United States Nuclear Regulatory Commission

Template = ADM-013 A. J. Murphy (AMS1)

Date:

5/21/03

Spent Fuel Project Office, Att: Ms. Snyder  
Mail Stop O13-D13  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-011

***Re: Comments on the Package Performance Study Draft Test Protocol***

To Whom It May Concern:

The unprecedented volume of proposed nuclear waste shipments to Yucca Mountain, Nev., and Skull Valley, Utah, would introduce new radioactive risks to communities across the country. The NRC should upgrade its regulations governing nuclear waste transportation to better protect public health and safety. Specifically, please take into account the checked items below as my comments on the Package Performance Study (PPS) draft test protocol:

- The proposed one-time tests are no substitute for physical testing as a requirement for all licensed casks. NRC cask licensing regulations should require full-scale physical testing of each cask design.
- At the very least, the NRC should physically tests *every* train and truck cask design proposed for use in conjunction with the Yucca Mountain Project and the Private Fuel Storage initiative.
- The PPS should include submersion testing, since nuclear waste shipments to Yucca Mountain could include barge shipments on both inland and coastal waterways.
- The PPS should include explosive testing to study cask response to a terrorist attack.

Sincerely,

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