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Date: Wed, Jun 4, 2003 3:38 PM
Subject: Response from "Comment on NRC Documents"

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Below is the result of your feedback form. It was submitted by

Marvin Resnikoff (radwaste@rwma.com) on Wednesday, June 04, 2003 at 15:37:52

Document_Title: Package Performance Study Test Protocols (NUREG-1768)

Comments: Package Performance Study Test Protocols (NUREG-1768)
Comments by Marvin Resnikoff, Ph.D.

The comments below are in addition to those submitted by the State of Nevada. Though filed late, we hope they can be incorporated into Staff deliberations.

Process:

We remain concerned about the entire process the NRC has set up to incorporate comments leading to cask testing. The NRC process involves the public sending comments into the NRC on NUREG-1768, and then having the NRC/Sandia essentially do what they please. In other words, there is no guarantee that the public's wishes will be accommodated. There is a better model. It would be far preferable to have Nevada and the general public comment on a draft RfP that would be issued by the NRC.

Rather than select Sandia Laboratories, the NRC should put the entire cask test program up for bid and should issue an RfP to allow Oak Ridge, Lawrence Livermore, Sandia and anyone else, including UNLV, to bid on the project or a piece of the project. We are concerned that Sandia Laboratories does not do honest work. Here is one example of several. In 1979, when the cask was placed above a burning pool of jet fuel for 90 minutes, the pressure relief valves on the water-filled cask opened (as they were supposed to) and evacuated steam. However, in no report Sandia issued will you see mention of the valves opening and the amount of steam released. In fact, in what must be considered poor technical work, Sandia never measured the amount of water before and after the fire test. For the public to have any faith in Sandia's work on thermal and impact tests, the work must be tightly constrained. For this to occur, a draft RfP should be commented on by the public and potential

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bidders. At West Valley, in the late '70's, the NRC allowed public interest groups to comment on the draft RfP's for work on high-level waste management.

Test Protocol:

In addition to comments on the test protocol already proffered by the State of Nevada, we remain concerned about one small aspect of the cask testing protocol, namely, the effect of the carriage on the tests. As we know, in its investigation of the Baltimore Tunnel fire, Battelle takes credit for the rail carriage shielding the cask. The NRC should evaluate whether it is appropriate to take credit for cask tie downs and the cask rail carriage. If so, then the NRC should also take into account the weight of the rail carriage in drop and back breaker tests. The 140 ton fully-loaded loaded Holtec cask then becomes the 211 ton HI-STAR 100 cask plus rail car, an additional 71 tons of weight. The NRC generally assumes that the tie downs would break in an accident, but this may not be a conservative assumption.

Thermal Considerations:

While it is true that for impact, particularly back-breaker impact, the Westinghouse 15x15 PWR assembly is the most vulnerable, for thermal other fuel assemblies may be more important. For thermal matters, the GE BWR Holtec configuration (68 BWR's) has the hottest assembly, not the Westinghouse PWR.

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