

January 14, 2008 (3:45pm)

Comment Info: =====

OFFICE OF SECRETARY
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ADJUDICATIONS STAFF

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General Comment: Comments on RIN 3150-AI24

In Section 1.b of preliminary HI-STORM CoC Amendment 5, the text in the fourth paragraph is proposed to be changed to "The weight designation is the approximate maximum weight of a loaded transfer cask?" The addition of the word "approximate" in this sentence is unclear in the context of CoC compliance that is required to be demonstrated by cask users. The word "approximate" should be deleted to restore the sentence to its previous version. The 100-ton and 125-ton transfer cask weights should not be specified as both approximate and maximum values because "approximate" is a subjective term and would indicate that the actual weight of the transfer cask can be somewhat higher than 100 or 125 tons and still comply with the CoC. Exceeding these maximum weight values to any degree would put the transfer cask into an unanalyzed condition because, throughout the HI-STORM FSAR, it is clearly stated that 100 and 125 tons (200,000 and 250,000 lbs, respectively) are the maximum, or bounding values used in the transfer cask safety analyses, including those for the lifting trunnions.

(See HI-STORM FSAR Tables 2.0.2, 2.0.3, 3.2.4, 8.1.2, 8.1.4, and Section 9.1.2.1.)

If it is the NRC's intention to allow cask users to use transfer casks weighing more than these bounding analysis values and permit supporting site-specific safety analyses to be performed under the provisions of 10 CFR 72.48, clarification is required. The CoC needs to specify a numerical range which would be considered "approximate" in order for the cask user to make a determination of compliance with the CoC and when NRC approval would be required for the heavier transfer cask.

Secy

From: Carol Gallagher
Sent: Monday, January 14, 2008 3:28 PM
To: Secy
Subject: Comment letter on HI-STORM 100 DFR 3150-AI24
Attachments: anonymous.txt

Attached for docketing is a comment letter on the above noted Direct Final Rule that was submitted via Regulations.gov on 1/6/08.

Thanks,
Carol

Received: from HQMS01.nrc.gov (148.184.200.149) by TWMS01.nrc.gov
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Content-Transfer-Encoding: binary
Date: Mon, 14 Jan 2008 15:28:00 -0500
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Thread-Topic: Comment letter on HI-STORM 100 DFR 3150-AI24
Thread-Index: AchW7B5xJA1xBx03SyeowlMOgmamdQ==
From: Carol Gallagher <Carol.Gallagher@nrc.gov>
To: Secy <SECY@nrc.gov>
Message-ID: <c632f7a3-b605-44da-a624-60e781e4278d>
Return-Path: Carol.Gallagher@nrc.gov