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# PUBLIC SUBMISSION

**Docket:** NRC-2016-0179

Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Requirements

**Comment On:** NRC-2016-0179-0005

Revisions to Transportation Safety Requirements and Compatibility with International Atomic Energy Agency Transportation Standards; Notice of Issues Paper, Public Meeting, and Request for Comment

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## General Comment

10. There has been a call, for well over a decade, by organizations such as NIRS, as well as Beyond Nuclear, for full-scale physical testing of shipping casks, to destruction. At one point, the NRC was saying it intended to do just that, in response to public pressure. But then NRC aborted that plan. We demand that such full-scale physical testing to destruction at long last finally take place, on each and every model of cask proposed to be certified to carry out transportation of irradiated nuclear fuel in the U.S.

Cask tests performed at Sandia National Lab some four decades ago have long been misrepresented by nuclear power and radioactive waste transportation proponents as some sort of "proof" that casks are impervious to breach. Films shot have been used as PR propaganda, without all of the context and facts explained. For one thing, some of the casks tested are no longer used; truth be told, current casks have not been similarly tested, and most certainly have not been full-scale physically tested to destruction.

For another thing, the tests themselves did not go as well as is portrayed.

For example, a fire test was ended, once lead radiation shielding began to melt and spurt out of the cask. However, the failure was later reworked into a supposed success -- by the half-truth of only mentioning how

long the cask did "survive" the fire without failing (not adding the rest of the story -- that a very short time later, the cask did indeed fail).

A dramatic looking collision between a cask and a locomotive, failed to mention that the sill of the train -- the main force -- did not strike the cask directly, because the cask had been jacked up higher to avoid it. Instead the cask crashed through the much thinner, sheet-metal like skin on the front of the train, doing less damage to the cask that way.

A classified weapons system attack on a cask, even decades ago, did significant damage to the cask -- including down to the level where irradiated nuclear fuel would have been emplaced, thus creating a significant pathway for hazardous radioactivity to escape. Weapons systems have only grown more powerful over the past several decades.

Both NRC and IAEA should never engage in the PR stunts involving the Sandia tests from the 1970s, and they should rebut nuclear power industry propagandists who attempt to deceive the public and elected officials in this way. As but the most recent example, which implicates a cask certification NRC has granted: in the D.C. Federal District Court on January 18, 2017, an attorney from the Department of Justice, representing the Department of Energy, bragged up the safety significance of the Sandia tests from the 1970s. Thus, she engaged in the same kind of propaganda the nuclear establishment has stooped to for decades, this time in an attempt to soothe a federal judge's concern about high-risk radioactive waste shipments. The case involves an environmental coalition, including Beyond Nuclear, challenging DOE's unprecedented proposal to ship highly radioactive liquid waste, for more than 1,000 miles, from Chalk River, Ontario, Canada to Savannah River Site, South Carolina, U.S.A. NRC certified a jury-rigged NAC-LWT cask for use with this highly radioactive liquid waste, even the cask was designed for solid materials.