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VIRGINIA ELECTRIC AND POWER COMPANY
RICHMOND, VIRGINIA 23261

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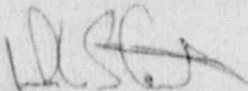
Gentlemen:

VIRGINIA ELECTRIC AND POWER COMPANY
COMMENTS ON DRAFT REGULATORY GUIDES
FRACTURE TOUGHNESS CRITERIA FOR FERRITIC STEEL SHIPPING
CASK CONTAINMENT VESSELS WITH A MAXIMUM WALL THICKNESS
OF FOUR INCHES (0.1m)
FRACTURE TOUGHNESS CRITERIA FOR FERRITIC STEEL SHIPPING
CASK CONTAINMENT VESSELS WITH A WALL THICKNESS GREATER
THAN FOUR INCHES (0.1m)

Virginia Electric and Power Company supports the development of regulatory guides on criteria for evaluating fracture toughness and test methods for Type B(U) and Type B(M) shipping cask containment vessels. However, we believe that regulatory guides in this area should be coordinated with the American Society of Mechanical Engineers (ASME) and the International Atomic Energy Agency (IAEA) efforts in developing fracture toughness criteria. We recommend that the NRC participate in the ASME industry group working to develop fracture toughness criteria for materials being considered for shipping casks. The IAEA has also recently initiated development of brittle fracture criteria. We encourage the NRC to participate in this process to ensure consistency with international developments in shipping regulations.

The proposed regulatory guides allow use of full scale drop tests for vessel wall thicknesses less than four inches, but do not advocate these tests for wall thicknesses greater than four inches on economic grounds. Virginia Electric and Power Company believes that full scale drop tests should be an option under both regulatory guides. Decisions regarding the economics of full scale drop testing should be left to the discretion of the licensee.

Very truly yours,



W. L. Stewart
Senior Vice President - Power