

Nov 2, 1999  
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54915

NOV 15 AIO:42

OFFICE OF SPECIAL ADJUTANT GENERAL

Secretary USNRC - Attn. Rulemaking and Adjudicators Staff - List of approved Spent Fuel Storage Casks - NAC-MRC addition. Proposed Rule - Public Comment:

As I wrote in my Oct 28 Comments, sent previously, I was sent an incomplete SER. Today I received a complete one

— can't figure why a section from front — including case description, QA etc. was missing — but also last 2 reference pages were missing — strange. Was the original SER complete when this CoC was put up for proposed rulemaking? This section and reference weren't added after that, were they? Only a complete CoC and SER should be up for rulemaking, and not until complete.

DOCKET NUMBER PR 72 (64FR45918) PROPOSED RULE

Not much here I didn't already comment on. Use of "Transport" I objected to — doesn't belong in here — this is for "Storage only". NRC has not certified this as "Transport compatible". Take that all out of "General Description". Shouldn't be there at all.

Stainless steel — good! P-15 drawing I didn't get before. Take off "Transportable" from label there. Shouldn't be there. 3-4 "lead slumping"?

p. 3-6 "experienced fabricator will ensure that processes chosen for fabrication will yield a durable cask" Who are experienced fabricators? That can "ensure" anything? I sure haven't seen any yet.

p 3-6 epoxy enamel — Have you checked the manufacturers directions for this? How long should it be cured before goes into pool? There was a problem at Trojan with that — was 10 days and they had a schedule to put it in within 7 — luckily schedule was changed. Thickness of paint, heat transfer — flaking? adherence? chemical reactions with pool water over time? etc. check all this. Can it be touched up or repainted? Rust blooms?



(2)

p3-5 This is the new gaze I'm really interested to see now. "Interlocking lead bricks" for transfer cask gamma shielding. you talk about temperature analysis OK "during transfer operation" and

will undergo "minimal slumping". What do you define as "transfer operations" in loading and unloading? What temperatures expected if vacuum drying or helium refill etc. Take longer than expected? What if fuel reaches temp. limit when they do UT tests? Is that done while TSC in transfer cask? How do you know the temperature of the lead in the transfer cask at all for sure? (in steam quench in unloading, in process of air cooling or water cooling while TSC is in transfer cask and you force air or cold water through the transfer — and TSC annulus to keep the fuel from boiling water in the TSC? And how would you know if the lead slumps and hot spots on the outside of the transfer cask are created? (I don't think these lead bricks sound good. I remember charges in the VSC 24 MTC for this stuff — debit sound good than either.)

Also the NS-4-FR neutron shielding — material is "a high hydrogen content" — "fire resistant" — makes no sense to me. How can it be both? Can this create hydrogen gas in any condition?? Has all chemical analysis for leak drop, tipover in transfer cask etc. been done for this — if wet, and water leaks in some welds of transfer cask — can gas form from NS-4-FR? Doesn't sound good. These parts could get wet if any welds leak.

p3-5 Welds — "and girth (if required) it says — "if"? don't they know?? at end 2nd reference gaze — one ref. from 1974 on tornadoes and one from 1978 for ALARA — Certainly for modern dry casks we need more recent research and references than from the 70's.

Faon Shillinglaw



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