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2003 JUN -6 AM 8:55

Rules and Directives  
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USNRC

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68 FR 8530

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E-RIDS = ADM-03  
Call = A. Snyder (AH53)  
A.J. Morphy (AH41)

United States Nuclear Regulatory Commission

Template = ADM-013

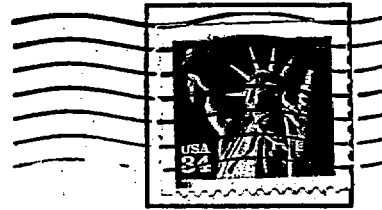
FROM:

DAN MORGAN

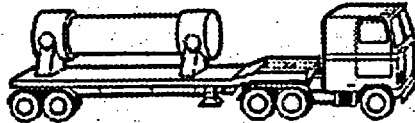
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RENO, NV

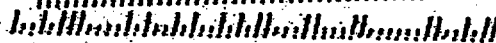
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Chief, Rules Review and Directives Branch  
U.S. Nuclear Regulatory Commission  
Mail Stop T-6-D-59  
Washington, DC 20555-0001



**Comment Regarding  
Package Performance Study Test Protocols**



**I want to see:**

- The NRC commit to changing the licensing procedures as needed to address any shortcomings that arise out of the full-scale tests it conducts, which should include puncture, crushing force, 1475° F fire for at least one hour, and deep immersion.
- The NRC conduct tests using high explosives and penetrating projectiles to assess risks of a terrorist attack.
- Full-scale testing to failure (radionuclide release or shielding compromised) to determine the physical limits of the casks.
- A comparison of stresses applied to the cask during the most severe credible accident to the experimentally determined failure limits.
- Computer modeling used only to improve cask designs.
- In general, full-scale physical testing for any cask design to be used for HLW/SNF transport.

**I do not want to see:**

- The full-scale tests advertised or implied by the DOE or NRC as regulatory tests unless the tests are the regulatory tests.
- The DOE or NRC claim, explicitly or implicitly, that the test satisfy the public demand for full-scale testing of casks if the tests are not the regulatory tests.
- Computer models used for regulatory licensing.
- The PPS become a public relations campaign for the NRC in an attempt to instill public confidence in the NRC and HLW/SNF transport.

Signed

*Dan Morgan*