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Rules and Directives
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E-RIDS=ADM-03
Add=A. Snyder (AMS3)

United States Nuclear Regulatory Commission

Template=ADM-013 A.J. Murphy (AJM1)

FROM:

Kim

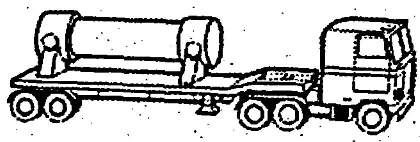
17 S. Virginia #204

Reno, NV

89501

RENO NV 895 PM 29 MAY 2003

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 wants 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

Kim Lloyd