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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

8. NRC's security regulations for irradiated nuclear fuel transport containers are also dangerously inadequate. This was clearly shown by a test at the U.S. Army's Aberdeen Proving Ground in Maryland in June 1998. A German CASTOR shipping cask was used, considered by some to be the "Cadillac of casks" due to its 15-inch die cast iron thick wall shell, much thicker in terms of metal than U.S. cask designs. A TOW anti-tank missile was fired at it. A hole as big around as a soft ball or grapefruit, was blown clean through the wall. This should have been no surprise, as TOW missile are designed to penetrate even thicker tank armor. And, contrary to statements as from U.S. Rep. John Shimkus (Republican-Illinois), TOWs were designed to hit Soviet T-72 tanks, that can travel faster than 30 miles per hour -- so they could also be used against radioactive waste trains going similar speeds, or more slowly, as they would while traveling through urban areas.

The hole breached in the cask would serve as the escape hatch for large-scale hazardous radioactivity to enter the environment, to fallout downwind, or flow downstream. Given the breach in radiation shielding, any emergency responders or nuclear workers approaching the breach could experience fatal doses of gamma radiation within minutes, making attempted plugging of the breach a potential suicide mission.

If the explosive attack were combined with an incendiary device, the release would be even worse. Cesium-137, for one, is highly volatile, and a large percentage would escape from any impacted fuel rods.

TOWs are now decades old, but are dangerously widespread on the international black market. However, even more powerful anti-tank missiles have been developed since, as well as sophisticated shaped charges.

Clearly, NRC's security regulations for casks must be significantly strengthened. (A NIRS backgrounder about the Aberdeen Proving Ground test, written by Paul Gunter, is posted online at:
<<https://web.archive.org/web/20160206062106/http://www.nirs.org/factsheets/nirsfctshdrycaskvulnerable.pdf>>