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November 17, 1978

PROJECT NUMBER  
PROPOSED RULE PR-72(43FR 46309)

Mr. Russell E.L. Stanford  
Fuel Process Systems Standards Branch  
Division of Engineering Standards  
Office of Standards Development  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Stanford:

Thank you for giving me an opportunity to review the proposed spent fuel storage regulation, 10CFR Part 72, before its final drafting. I have not been in my office enough to assure prompt delivery of my mail, so I hope my comments reach you in time to be useful.

In general, the proposed regulation reads smoothly, and it is immediately apparent that the authors were aware of the current ideas concerning siting and design of Independent Spent Fuel Storage Installations. I was impressed with the message presented under Supplementary Information. Subpart F-General Design Criteria also appears to be exceptionally well written; I hope that John Nevshemal, Science Applications, Englewood, Colorado, also had a chance to read this.

I hesitate to endorse any statement in the regulation which requires ISFSI's to be designed to withstand a 0.25g acceleration or requires the sites to have a ground motion potential of no more than 0.25g. Philosophically, I have no quarrel with the concept of using existing seismic risk maps, choosing sites with earthquake ground motion potential of no more than 0.25g with recurrence interval of 500 years, and building the ISFSI without costly site-specific investigations. It is an excellent alternative.

The other alternatives should be defined as clearly as the one just discussed. Transportation may become a more serious problem than would be the designing of an ISFSI for a site where horizontal acceleration may be expected to exceed 0.25g. In a few years this option may be extremely important and the option should be clearly available.

The psychology of requiring an ISFSI to be designed to withstand 0.25g acceleration becomes bothersome when the ISFSI is to be located near the site of a nuclear power plant that was constructed to withstand 0.15g acceleration. Whether the reasons be psychological or economic, there should be a clear option of



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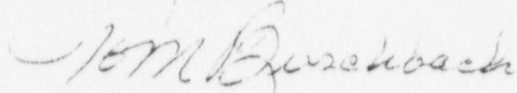
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performing a site specific seismic investigation and of negotiating a design value of less than 0.25g.

The latter options should be readily available rather than being presented as an acquiescence. We are currently working on a new seismic risk maps, and the options are apt to become more important in the future.

Thank you again for permitting me to express my opinion.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "T. C. Buschbach".

T. C. Buschbach  
Research Professor of Geology