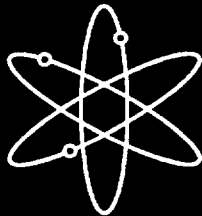
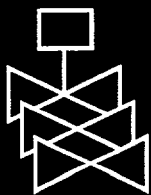


Spent Nuclear Fuel Transportation Package Performance Study Issues Report



Sandia National Laboratories



**U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards
Washington, DC 20555-0001**



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Spent Nuclear Fuel Transportation Package Performance Study Issues Report

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ABSTRACT

This report presents the results of the scoping phase of the Package Performance Study which Sandia National Laboratories (SNL) is performing for the U.S. Nuclear Regulatory Commission (NRC). The report presents SNL's evaluation of the research that could be undertaken to address stakeholder concerns about the safety performance of spent fuel and spent fuel packages during the unlikely but severe transportation accidents and thereby increase public confidence in the safety of spent fuel shipments. The Package Performance Study will reexamine the level of protection provided by NRC certified spent fuel transportation package designs under severe accident conditions. The study will update the methods and results of a 1987 study of package performance under severe accident conditions, commonly referred to as the Modal Study (NUREG/CR-4829), and the extensions of those methods used in a recently completed study (NUREG/CR-6672), which estimates the risks of transporting spent fuel by truck and rail.

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EXECUTIVE SUMMARY

This report presents the results of the scoping phase of the Package Performance Study which Sandia National Laboratories (SNL) is performing for U.S. Nuclear Regulatory Commission (NRC). The report presents SNL's assessment of the research that could be undertaken to address stakeholder concerns about the safety performance of spent fuel and spent fuel packages during unlikely but severe transportation accidents and thereby increase public confidence in the safety of spent fuel shipments.

The Package Performance Study will reexamine the level of protection provided by NRC certified spent fuel transportation package designs under severe accident conditions. The study will update the methods and results of a 1987 study of package performance under severe accident conditions, commonly referred to as the Modal Study (NUREG/CR-4829), and the extensions of those methods used in a recently completed study (NUREG/CR-6672), which estimated the risks of transporting spent fuel by truck and rail.

This report considers the issues and concerns that were raised at four public meetings and by questions and comments submitted to the NRC as a result of those meetings. The report considers issues and concerns in five topic areas:

- Package Performance During Collisions,
- Package Performance During Fires,
- Spent Nuclear Fuel Behavior during Accidents,
- Highway and Railway Accident Conditions and Probabilities, and
- Other Transportation Safety Issues.

In each topic area, each issue or concern is discussed and resolution options are proposed, costed, and assigned a rating that reflects the importance of the technical results that would be developed by the resolution option and the degree to which those results would contribute to increased public confidence in spent fuel transportation safety.

The review and assessment of stakeholder concerns about spent fuel package performance are summarized in Table E-1, and the four principle issues that SNL believes should be studied are:

- validation of finite element package collision damage predictions by comparison to test results,
- validation of thermal analysis predictions of package heating rates in fires by comparison to test results,
- determination of fuel pellet, fuel rod, and fuel assembly response to severe impact environments by tests and computations, and
- reconstruction of the truck and train accident event trees developed by the Modal Study.

Table E-1 Summary of the Issues Raised at the Four Public Meetings

Resolution Option [section where discussed]	Sandia's Rating	Estimated Cost	Recommended Options
Purchase of full scale rail cask [2.9]	A	Very High	X
Full scale rail cask rocket sled collision test [2.9]	A	High	X
Design and construction of 1/3 scale rail cask [2.9]	B	High	
1/3 scale rail cask cable pulldown collision test [2.9]	B	High	
Validation of scale model testing [2.8]			
If a scale model cask is tested	A	Low	
If a real full-scale cask is tested	C	Low	
Finite element modeling of either cask collision test [2.4]	A	Medium	X
Dual-purpose casks (effect cask, storage) [2.7]	A	Medium	X
Impact response of pellets, rods, and fuel assemblies [4.3]	A	Medium	X
Calorimeter pool fire test [3.1]	A	High	X
3D thermal modeling of pool fire test [3.1]	A	High	X
Cask pool fire test [3.1]			
Undamaged cask	A	Medium	
Damaged cask	B	Medium	
Fuel types [3.1]	B	Medium	
Event tree structures and branch point probabilities [5.3.4.5]	A	Medium	X
Occurrence frequencies of route wayside parameters [5.3.4.2]	A	Medium	X
Specific historic severe accidents [5.3.4.6]	A	Low	X
Speed and fire duration distributions [5.3.4.4]	B	Low	
Human error probabilities [5.3.4.3]	B	Low	
Specific routes [5.2.4.2]	B	Low	
Sensitivity study [6.3.1]	A	Low	
Collisions with non-planar objects [2.2]			
By finite element analysis	B	Medium	
Using NTP and Eiffort results	C	Low	
Impacts onto yielding targets [2.5]			
Analysis by finite element calculations			
Using deformable test cask	B	High	
Using rigid test cask	B	Medium	
Analysis by engineering calculations	C	Low	
Analysis using empirical data	D	Low	
Crushing environments [2.3]	B	Medium	
Characteristics of collision accidents (orientation, impact angle) [2.1]	B	Medium	
Finite element calculations to examine effects of human errors [2.6]			
Using models developed for the Package Performance Study	B	Low	
Using NUREG/CR-6672 models	C	Low	
Differences between truck and rail fires [3.2.3.2]	C	Low	
Torch fires [3.2.3.1]	C	Low	
First responder fire accident actions [3.4.3.1]	C	Low	
Cask damage from explosions [3.4.3.2]	D	Medium	
Accident test sequence [3.3]	D	Low	
Dependence of accident rates on accident conditions [5.2.4.1]	C	Low	
Correlations among accident risk parameters [5.3.4.1]	C	Low	
Full uncertainty study [6.3.2]	D	High	
Accident rate uncertainties [5.2.4.4]	D	Medium	

1. INTRODUCTION

This report presents the results of the scoping phase of the Package Performance Study (PPS) which Sandia National Laboratories (SNL) is performing on behalf of the U.S. Nuclear Regulatory Commission (NRC). The report presents SNL's assessment of the research that could be undertaken to demonstrate the safety performance of spent fuel and spent fuel packages during unlikely but severe transportation accidents and to increase public confidence in the safety of spent fuel shipments. Succeeding program phases will develop test and analysis protocols, perform these tests and analyses, and document their results.

1.1 Background

The overall purpose of the Package Performance Study is to update the NRC's evaluation of the level of protection provided by NRC certified spent fuel transportation package designs under severe accident conditions. The study is expected to provide additional confirmation of results developed by previous NRC studies of spent fuel package performance and the risks associated with shipping spent fuel in NRC certified spent fuel casks. NRC will use the results of this study to continue NRC's ongoing evaluation of the risks of spent fuel transportation and the level of safety provided by NRC's approach to the regulation of spent fuel transportation.

NRC previously studied spent fuel package performance during accident conditions in the 1980s. The results of that study, which is usually called the Modal Study, were published in NUREG/CR-4829 [1] and summarized in NUREG/BR-0111 [2]. Recently SNL used extensions of the methods of analysis developed by the Modal Study to reexamine spent fuel truck and rail transportation risks for the NRC. The results of this study were published in NUREG/CR-6672 [3].

The risks associated with the transportation of highly radioactive spent nuclear fuel from nuclear power plants to an interim storage facility or to an underground permanent repository are important to both the NRC and the public because the number of spent fuel shipments is expected to increase significantly if these facilities begin operating. To date, about 1300 shipments of spent nuclear fuel have been made in NRC-certified packages without the release of radioactivity from the spent fuel package to the environment. Despite this exceptional safety record and the finding by previous NRC studies that spent nuclear fuel can be shipped safely, some stakeholders may still have questions or concerns regarding the performance of spent fuel packages during highly unlikely accidents that are much more severe than any of the accidents that have occurred during past spent fuel shipments. For example, several groups have suggested that neither NRC's cask standards nor the Modal Study adequately demonstrate that NRC-certified spent fuel packages will provide adequate safety during unusually severe transportation accidents. One goal of the Package Performance Study is to respond to those concerns by performing studies that will enhance public confidence in package performance.

The scoping phase of the Package Performance Study had three objectives: (1) examination of the need to revisit the conclusions of the 1987 Modal Study, to evaluate their continued validity,

and to extend the methods used to develop those conclusions, (2) identification of studies needed to confirm the risk results documented in NUREG/CR-6672, and (3) increasing public confidence in the safety of spent fuel transportation.

The NRC is actively seeking suggestions and comments about the design of the Package Performance Study. Suggestions and comments were initially sought by holding four public meetings, the first in Bethesda MD on 17 November 1999, the second and third in Henderson NV on 8 December 1999, and the fourth in Pahrump NV on 9 December 1999. At each of these meetings, stakeholders from affected organizations and citizens discussed their concerns about the transportation of spent fuel. To further facilitate public participation in this project, an interactive project website (<http://ttd.sandia.gov/nrc/modal.htm>) was established in the fall of 1999. To ensure that public concerns about spent fuel transportation were identified before NRC made any decisions about the issues that will be examined by experiments or analysis during succeeding phases of this study, this report was distributed to interested parties for comment and was discussed at four additional public meetings, the first and second in Las Vegas NV on 15 August 2000, the third in Pahrump NV on 16 August 2000, and the fourth at NRC's offices in Rockville MD on 13 September 2000. At each of these four meetings, the results and conclusions of the NUREG/CR-6672 report were also summarized and discussed. Additional comments and concerns about spent fuel transportation, about the NUREG/CR-6672 study, or about this report can be submitted to NRC or Sandia Laboratories by letter, email, or the project web site. Email or letters should be sent to:

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This report considers the issues and concerns that were raised at the eight public meetings and by questions and comments submitted to the project web site. The report also considers issues and concerns raised by letters and reports submitted to the NRC by meeting attendees and includes perspectives from SNL's review of literature relating to the safety of spent fuel shipments. SNL has grouped the issues into topical categories, discussed the issues that relate to each category, and proposed at least one resolution option for each issue. Additionally, SNL has attempted to characterize each issue in terms of its safety significance and contribution to enhancing public confidence in the safety of spent fuel transportation. SNL developed resolution options only for issues that pertain to the performance of spent fuel and spent fuel packages when subjected to severe accident conditions. Resolution options were not developed for issues that did not relate to fuel or package performance; for example, resolution options were not suggested for post-accident recovery issues. The fact that a resolution option is not proposed for an issue raised in this report does not mean that the issue is viewed as unimportant by the NRC. Conversely, the fact that a resolution option is proposed for an issue does not guarantee that the issue will be examined during the course of the Package Performance Study.

1.2 Report Structure

This report considers concerns in five topic areas:

- Container Performance During Collisions,
- Container Performance During Fires,
- Spent Nuclear Fuel Behavior during Accidents, and
- Highway and Railway Accident Conditions and Probabilities,
- Other Transportation Safety Issues.

The report sections that deal with each of the five topic areas are organized as follows. First, the concerns and issues raised at the public meetings, in documents submitted to the NRC as a result of these meetings, or in previous transportation risk studies are summarized. Second, the technical concerns raised by each issue are discussed. Third, ways to resolve each issue by performing studies, calculations, and/or experiments are proposed, the cost of each resolution option is estimated, and each option is assigned a rating that reflects the importance of the technical results that would be developed by the resolution option.

The following tables define the cost and rating indicators assigned to the resolution options.

Cost Indicators	
Descriptor	Range
Low	<\$100K
Medium	\$100 to 249K
High	\$250 to 1000K
Very High	>\$1000K

Technical Importance Indicators	
Descriptor	Definition
A	Resolves a very important technical shortcoming or confirms the adequacy of a very important analysis method
B	Resolves an important technical shortcoming or confirms the adequacy of an important analysis method
C	Resolves a secondary technical shortcoming or confirms the adequacy of secondary analysis methods
D	Not viewed as significant or answer already essentially known

Finally, the assessments, interpretations, recommendations, and conclusions presented in this report with regard to any issue are based on the knowledge and judgements of Sandia transportation experts and thus do not necessarily reflect the views of the NRC with regard to the particular issue.

2. CONTAINER PERFORMANCE DURING COLLISIONS

2.1 Characteristics of Collision Accidents

2.1.1 Comments and Issues Raised

The following indented paragraphs summarize the comments about collision accident characteristics that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

The speeds at which collision accidents might occur were discussed. Examination of collisions that occur at speeds that exceed the regulatory impact test velocity of 30 mph was strongly recommended. Examination of truck collision accidents with speeds of 70 to 75 mph and train accidents with speeds of 85 to 90 mph was recommended. It was noted that if the impact surface was unyielding, then these speeds might need to be modified.

It was noted that the orientation of the cask upon impact is important. It was suggested that sideways cask impacts onto hard targets shaped so that they fit between the cask impact limiters should be investigated.

The effects of using dedicated trains on rail accident severities was discussed. It was noted that dedicated trains can apply their brakes more quickly than regular freight trains, that "strain coupling" probably prevents cars in the consist (mixture of cars in the train) of the dedicated train from running into each other, and that dedicated train derailment accidents will be less likely if buffer cars are weighted similarly to the other cars in the dedicated train consist.

Study of rail accidents where one train collides with a second train was recommended.

Sandia believes that these comments raise the following technical issues:

- (1) Accident speeds greater than the certification test speed need to be examined. In particular, the distribution of accident speeds needs to be developed since many commentors believe high-speed collision are likely to significantly damage a cask.
- (2) Impact damage will depend strongly on the hardness of the impact surface and the cask impact orientation relative to the accident velocity vector.
- (3) For rail accidents, the effect of consist on accident types and severity should be examined.

2.1.2 Sandia's Discussion of These Issues

The severity of any accident on the event tree depends on several parameters that are not part of the event tree. These parameters include the cask speed and orientation at impact, the angle between the velocity vector and the surface, the orientation of the cask, and the characteristics of

the impacted object/surface. In a risk assessment the distributions for each of these parameters must be determined, and each distribution can vary with accident type. Also, the effect of each of these parameters must be determined. For some of the parameters, the effect of its variation depends on other parameters. For example, the angle of the velocity vector to the surface will have a different effect for impacts onto relatively hard surfaces where indentation of the surface is small than it will for relatively soft surfaces where the indentation is large. The characteristics of the impacted object/surface also determine if the accident can result in a puncture environment. Past risk assessments have developed distributions for impact angle and cask orientation based upon engineering judgment. For many of the event tree paths, the cask orientation is influenced by the fact that, during normal transportation, the velocity vector of the transport vehicle is aligned with the axis of the cask. The rotational inertia of the cask will tend to maintain this orientation during an accident. However, it is possible for lateral forces to cause the cask to rotate during the progression of the accident, so that the velocity vector is no longer aligned with the cask axis. Impact angle is influenced by the fact that the original velocity vector of the cask at the time of accident initiation will lie parallel to the wayside accident surface. Therefore, most cask surface impacts will occur at relatively shallow or glancing angles.

2.1.3 Issue Resolution Options

For many accident types the initiating speed is significantly greater than the impact speed, as the transport vehicle will often slow down during the progression of the accident. A method should be developed to estimate impact velocity from initial accident velocity and accident characteristics. For accidents that involve falling off a bridge or going down a slope, the bridge or slope height distributions determine the impact velocity. Surveys along selected transportation corridors should be conducted to develop these distributions.

It is possible for future risk assessments to use distributions of cask orientations and impact angles based upon engineering judgment, but if they are to be technically and publicly defensible, a more rigorous method for developing the distributions is needed. It is possible to develop for each transportation mode a kinematic model that predicts how the velocity vector and orientation of the cask change as an accident progresses. Distributions of cask orientations upon impact could also be developed using Monte Carlo sampling techniques or by surveys of accident data and route characteristics.

Sandia Rating	B
Estimated Cost	Medium

2.2 Collisions with/by Non-Planar Objects

2.2.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about collisions with non-planar objects that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

It was noted that impacts with objects that fit between the cask's impact limiters may damage a cask severely. It was recommended that mid-cask wraparound be considered – especially the effects of these collisions on bolts and closures. It was also suggested that impacts with vehicle structural frames and couplers be studied.

These comments raise the following issue:

The NRC regulatory impact test involves impact onto a flat essentially rigid target. All previous risk assessments have focussed on impacts with flat targets. Cask designers incorporate impact limiters on the ends of the cask that can be bypassed by impacts with non-flat targets, especially objects such as boulders, columns, the corners of abutments, and other casks.

2.2.2 Sandia's Discussion of These Issues

Accident classes where impacts between the impact limiters are likely to occur are rail-car pile-ups when several casks are being shipped at once and landslides where a large boulder can strike the center of the cask. Cask designers incorporate impact limiters on the ends of the cask that can be bypassed by impacts with non-flat targets. Examples of non-flat targets include, but are not limited to, bridge supports, tunnel faces, some rock out-croppings, transportation vehicle frames, train couplers, and other casks. To a certain extent issues concerning impacts with non-flat surfaces arise from indiscriminant application of the definition for failure used in the Modal Study (strains higher than 0.2% in the inner shell of the steel-lead-steel wall implied a 100% cask-to-environment release) [1]. It is possible for impacts that bypass the impact limiters to produce inner shell strains greater than 0.2% at a velocity that is lower than the velocity required to produce this strain level for impact onto a flat target (the regulatory puncture test is an example of this). However, because the middle of the cask does not contain any containment penetrations, plastic deformation in the middle of the cask is less likely to lead to release of radioactive material than plastic deformation near the closure of the cask. Because the closure of the cask is protected by the impact limiter, collision with a non-planar object near the closure will involve the impact limiter, and therefore is not significantly different than impact onto a large flat surface which always involves the impact limiter regardless of the cask orientation at impact. Analyses by Eiffort et al. [4] of cask-to-cask collisions that show very low strains in the closure region, but relatively high strains in the middle of the cask are a starting point to address these concerns.

2.2.3 Issue Resolution Options

The DOE National Transportation Program will initiate a study that includes impacts onto non-planar objects during FY01. Information from that study and the results of the analyses by Eiffort et al. [4] can be used as references in this study to develop a position on the risk associated with impacts against non-planar objects.

Sandia Rating	C
Estimated Cost	Low

Finite element analyses of impacts involving non-planar targets and impacting bodies can show if this type of impact is more or less likely to lead to cask release than impacts onto flat surfaces. The most probable non-planar objects that could lead to cask damage are other casks, large concrete bridge supports, or locomotives.

Sandia Rating	B
Estimated Cost	Medium

2.3 Crushing Environments

2.3.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about crushing accident environments that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

The possibility that during some accidents a massive heavy object, for example a section of a bridge, may fall on the cask subjecting it to a crush load was raised by several commentors. It was suggested that, for crush accidents, the impact cross-section should be described and a bounding approach should be used. It was recommended that rail derailment accidents where there is more than one cask on a train should be examined, because these accidents may lead to cask-to-cask collisions.

These comments raise the following issue:

10 CFR Part 71 does not have a dynamic crush test for spent fuel casks. This leads to public uncertainty of the ability of casks to withstand crushing events, as it may be difficult to relate the inertial crush environment from the impact test to a static or dynamic crush environment. Because many accidents, such as cask-to-cask collisions during rail accidents, may lead to dynamic crush environments, the response of casks to crush environments should be investigated.

2.3.2 Sandia's Discussion of These Issues

Spent fuel casks are required to pass an impact test that exposes the cask to large inertial crush forces. For objects as large as spent fuel casks the inertial crush force from the regulatory impact is much higher than the dynamic or static crush forces that the casks are likely to experience during any accident. The concern about crushing environments is usually for casks being crushed by objects that contact them between the impact limiters. Accident scenarios that can develop crushing forces include railcar pileups, landslides, and the collapse of sections of bridges or elevated highways onto a cask.

2.3.3 Issue Resolution Options

Initially, the magnitude of the problem should be determined. Are there possible crush environments that result in forces larger than the inertial crush forces from the regulatory impact test? Sandia believes the answer to this question is probably no, but if it is yes, with what frequency do they occur? Do these environments lead to crush forces that are larger than the

inertial crush forces experienced in the extra-regulatory analyses performed for risk assessments? The answers to these questions in conjunction with the resolution of the previous issue will determine if any additional work is needed to resolve this issue.

Sandia Rating	B
Estimated Cost	Low to determine the magnitude of the problem
Estimated Cost	Medium for analyses if they are needed

2.4 Finite Element Modeling

2.4.1 Comments and Issues Raised

The following indented paragraphs summarize the comments about finite element modeling that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

Commentors stated that finite element cask models should implement a discrete way to look at bolts and allow damage to several bolts and the effect of improper cask closure on closure damage to be examined.

The AAR review [5] of the original Modal Study [1] and comments made at public meetings held during past spent fuel shipping campaigns raise additional concerns about the modeling of cask impacts. Most of the additional concerns focus on specific examples of the way packages have been modeled in previous risk assessments. Specifically, in the Modal Study there was no attempt to model the spent fuel contents of the packages, but instead the mass of the contents was added to the mass of the inner shell of the steel-lead-steel casks studied. In NUREG/CR-6672 [3] the contents of the cask were modeled as a lumped homogenized mass, rather than as discrete structures. Neither of these two approaches can be used to deterministically predict the behavior of the spent fuel assemblies. Both studies therefore used other parameters to predict the behavior of the spent fuel contents during collisions.

These comments raise the following issues:

The degree of detail implemented in finite element cask models strongly affects the precision of finite element predictions of cask damage during severe impacts, especially damage to the cask closure.

Indirect determination of spent fuel response to impact forces increases the level of uncertainty in estimates of fuel damage. Approximate modeling of the contents of the cask only provides a general understanding of the way the contents may apply loads to the cask body and closure lid.

2.4.2 Sandia's Discussion of These Issues

Both the Modal Study [1] and NUREG/CR-6672 [3] used finite element modeling to investigate the behavior of casks to a wide variety of accident environments. The wide range of impact

velocities investigated in these studies required the analyses to use simplified models compared to the current capabilities of finite element modeling. More detailed analyses are typically performed for cask certification, and far more detailed analyses are possible with the massively parallel computers now available. The finite element models in the Modal Study did not include the closure and the contents. The finite element models in NUREG/CR-6672 included both closures and contents, but did not include the fine details of both of these areas. The models used in the previous studies were sufficient to capture the general behavior of the casks, but not the behavior of cask sub-systems (e.g., closure bolts, penetrations, fuel assemblies).

2.4.3 Issue Resolution Options

A very detailed finite element model of one or two casks could be used to determine the adequacy of the models used in previous studies. If the generic designs from NUREG/CR-6672 [3] are used for a starting point for the detailed model, the comparison can be made directly. If another generic or cask specific design is used for the detailed model, a less detailed model that is similar in detail to the ones used in the NUREG/CR-6672 could also be used to support the comparison. The detailed model should start at the level of individual fuel pins. The modeling can be performed in stages, with the first stage being to perform an analysis of a single fuel pin to determine how the pin responds to forces applied to it. The results from the fuel pin model would then be used in a model of a complete fuel assembly. The results of the assembly model would be used in a model of the entire basket. The results of the basket model would be used to determine the properties of the contents in an overall cask model. The results of the full model could then be compared to the results of the models used in NUREG/CR-6672 and/or to the results of physical tests.

Sandia Rating	A
Estimated Cost	Medium - not including benchmark tests (see testing purpose)

2.5 Impacts onto Yielding Targets

2.5.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about yielding targets that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

Cask damage during collisions depends both on impact speed and on the hardness of the impact surface. The damage done by high-speed impacts onto yielding targets needs to be examined.

These comments raise the following issue:

The effect of surface hardness on cask damage during impacts onto yielding surfaces should be developed by review of test data and/or performing engineering or finite element calculations for impacts onto yielding targets.

2.5.2 Sandia's Discussion of These Issues

There is an infinite range of possible targets that can be involved in a cask collision. Determination of the response of a cask to an impact onto all targets at all possible velocities, impact orientations, and impact angles is not feasible. For risk assessments, the general approach is to divide the set of possible targets into groups and determine the response to impacts onto a single target within each group.

2.5.3 Issue Resolution Options

Several methods are available to determine the cask response to impacts onto each of these representative targets:

- (1) **Empirical Data** can be used where tests have been performed. The limited amount of test data available for this approach requires that many extrapolations are necessary. The use of extrapolated empirical data often raises technical questions regarding accuracy. This was the method used in NUREG/CR-6672, and there is very little merit in repeating those calculations.

Sandia Rating	D
Estimated Cost	Low

- (2) **Engineering Calculations** can be conducted using known (or assumed) target properties to develop response characteristics. The civil engineering profession has well established methods for calculating the stiffness of structures such as bridge columns and surfaces such as compacted fill for road-beds and rock faces. Most of these methods are only applicable to statically applied loads, and neglect the inertial effects that are important for cask impacts and would need to be considered.

Sandia Rating	C
Estimated Cost	Low

- (3) **Finite Element Analyses** of specific targets can be performed using either a rigid cask or the deformable cask used in the finite element calculations discussed above. If a rigid cask is used, these analyses will give a force-vs.-penetration curve for the target, and a method for relating the results of the analysis to a lower velocity impact onto an unyielding target must be developed to determine the response of the cask.

Sandia Rating	B
Estimated Cost	Medium - rigid cask
Estimated Cost	High - deformable cask

2.6 Effects of Human Errors

2.6.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about human errors that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

Human error and human performance factors should be considered with respect to cask manufacture and loading. However, human error can't always be singled out from other causes, and human performance in transportation helps as often as it hurts.

These comments raise the following issue:

Cask manufacturing or operational errors may increase the likelihood and severity of cask failures during impact accidents.

2.6.2 Sandia's Discussion of These Issues

Some of the possible human errors that should be considered include improper fabrication of the cask (this can be examined by changing the material properties and/or failure thresholds used in finite element calculations), failure to drain the water from the cask (water can be included in the finite element model), failure to torque the closure bolts (bolt pre-stress can be neglected), and improper installation of the impact limiter (analyses can be performed without the impact limiter). Of course, it is not possible to include all sources of human error. However, the impact of likely human errors on cask performance should be examined. Once the magnitude of the effect and its probability of occurrence have been estimated, the significance of human errors can be determined.

2.6.3 Issue Resolution Options

Finite element analyses that include cask defects can be performed. It requires little effort to change the finite element models developed in section 2.4.3 to include imperfections caused by human error. This would allow the importance of the human errors with respect to cask response to be determined.

Sandia Rating	B
Estimated Cost	Low

Alternatively, the cask defects can be added to the simpler finite element cask models used in NUREG/CR-6672 and the new analysis results can be compared to those from that study.

Sandia Rating	C
Estimated Cost	Low

2.7 Dual-Purpose Casks

2.7.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about dual-purpose casks (casks approved by the NRC for both storage and transportation of spent nuclear fuel) that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

Most of the spent fuel to be transported in the future will be carried in dual-purpose casks.

This comment raises the following issue:

Dual-purpose casks generally have two containment boundaries. The inner containment boundary is a welded canister and the outer containment boundary is typical of current generation spent fuel casks. The effect of the additional containment boundary on accident consequences should be examined.

2.7.2 Sandia's Discussion of These Issues

The behavior of dual-purpose casks during impact and puncture accidents is significantly different than the behavior of transportation only casks. Dual-purpose casks typically have multiple containment boundaries. The wall cross-section of the inner containment boundary is quite thin, which allows this layer to undergo large deformations without producing strains large enough to cause rupture. Depending on the impact orientation and the loading to the inner containment vessel, the deformation may be primarily in the vessel wall, and not in the closure region. Some dual-purpose casks have welded inner containment vessel closures. This type of closure is much less likely to fail in both structural and thermal accidents. Even if there is a breaching of the inner containment vessel, the release path is more torturous and through multiple compartments, resulting in much lower release fractions for the same hole size.

Dual-purpose casks have generally been used for the dry storage of spent fuel for some period of time before transportation. This leads to greater uncertainties on the condition of the fuel during the transportation phase. Similarly, the dry storage environment could adversely affect other components of the cask, such as the basket.

2.7.3 Issue Resolution Options

The effect that multiple containment boundaries have on the release of radioactive material from casks subjected to severe transportation accidents can be determined by the use of finite element modeling and by performing source-term analyses. An inner containment vessel can be added to the finite element models developed for the other analyses and several of the more severe accident conditions can be evaluated. Based upon a literature review, the material properties in the finite element model could be adjusted so that they approximate conditions of the cask and

contents after the dry storage period. It is Sandia's opinion that it is quite likely that the literature review will reveal that there is no degradation of material properties that are important to safety.

Sandia Rating	A
Estimated Cost	Medium

2.8 Validation of Scale Model Testing

2.8.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about testing of scale models that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

One-tenth to quarter scale testing is not satisfactory; half-scale testing or other partial-scale testing could be considered. Full-scale physical testing with a real cask should be done. Testing should include wear and tear on the cask because the cask is used repeatedly. Testing is primarily for benchmarking and validating codes. Full-scale testing should be done to benchmark the codes used to predict cask responses in fires and collisions. TRUPACT-II was tested because there was no faith in the codes. WIPP represents the only acceptable transportation campaign, because there was full-scale testing of the TRUPACT-II.

These comments raise the following issue:

There is little public confidence in the ability of sub-scale tests to accurately capture the response of spent fuel casks to severe impacts.

2.8.2 Sandia's Discussion of These Issues

Scale model testing has been extensively used in cask certification, engineering tests, and technology development activities in many complex technical areas. Scaling relationships for most of the phenomena associated with cask behavior are well understood and firmly based on the equations of Newtonian physics. There are, however, several problems with conducting scale model tests. Foremost of these is the difficulty in constructing an exact scale model of the cask. Will the scale model materials behave the same as the full scale ones at the scaled strain-rate? Areas of special concern include the impact limiters, welds, neutron and gamma shielding, bolts, and contents. Leak rate does not scale, and it is the most important measure of cask success in a test. It is impossible to test the scale model cask in a scaled gravitational field. Gravitational forces are generally very small relative to inertial forces so this problem is not severe for most cases. It does result in higher rebound heights for scale model test units than for full scale ones, which may have an effect on slapdown impacts.

2.8.3 Issue Resolution Options

The validity of scale model testing can be shown by discussion of the physical principles used in the development of scaling relationships. Examples of other industries that rely on scale model tests can also be given. However, past efforts along these lines have had limited success in achieving public confidence in the soundness of scale model testing. There have even been some cases where scale model testing was compared to full-scale tests (i.e., Magnox flask testing program, [6]). It should not be a goal of this study to validate the use of scale model tests for certification of cask designs, but if scale model tests are used in this program for demonstration and/or benchmarking purposes, a technical review and discussion of scale modeling principles should be conducted.

Sandia Rating	C if full scale testing is performed for this study
Estimated Cost	A if scale model testing is performed for this study Low

2.9 Purpose of Testing

2.9.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about the purpose of cask testing that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

Commentors were concerned that the purpose of cask certification tests and extra-regulatory tests should be distinguished. It should be explained that testing to meet regulatory standards is deterministic, but the performance of a cask in the extra-regulatory environment is used probabilistically in risk analysis. Commentors noted that it should be made clear that the work performed for this study is not intended to support the certification of any particular cask, and that any cask that is certified by the NRC must pass all of the certification tests.

Commentors noted the study should be clear on what the goal of the test was and why the test scale will yield the desired results. The explicit goal of each test performed should be stated including the testing parameters and exactly what is being tested, the cask and/or its contents. The objectives and purpose of each test should be clear, and questions of the sort "You tested this – why not that?" should be answered. The goal of each test should be to advance level of knowledge or level of confidence.

At the meetings it was observed that it is not possible to answer all questions with tests. Most commentors noted that testing only in the belief that testing alleviates concern is not satisfactory, and there will still be concern about casks that have not been tested.

Testing to destruction is pointless; real conditions should frame the study. Do not conduct a test that shows gross failure. Test results can easily be taken out of context.

2.9.2 Sandia's Discussion of These Issues

Cask testing may be performed for many reasons. A demonstration test such as the crash tests performed by Sandia in the 1970s [7] and the CEGB in the 1980s [6] can be used to show the robustness of casks when subjected to severe environments that are readily understood by the public. Tests with extra-regulatory impact velocities can be used to show the margin of safety of current or planned cask designs. Tests can be performed to demonstrate the ability of analytical methods to predict the response of casks to the test environment. Tests can be performed to determine boundary conditions to use in the analytical methods. Tests can be performed to demonstrate the ability of the cask to satisfy the regulatory requirements (certification tests). Tests can be performed to advance the state of knowledge of cask performance. Some tests can be designed to perform two or more of these purposes. When tests are performed, it should be stated beforehand what the purpose of the test is and how the success of the test will be determined.

2.9.3 Issue Resolution Options

The primary purpose of any tests performed for this study should be the validation of finite element predictions. The ability of the finite element method to model structures undergoing large deformations has been demonstrated in many applications. What is somewhat unique about cask behavior during severe impacts is the influence of interfaces between several dissimilar materials with vastly different stiffnesses. In order to examine this problem, the benchmarking collision tests should examine a complete cask system (i.e., contents, shell, closure, and penetrations).

Sandia believes the test should involve sufficiently large deformations to demonstrate that the finite element method is accurately predicting behaviors (closure or penetration failures) that could lead to a release of radioactive material. Therefore, it would be beyond the regulatory tests. A significant amount of finite element modeling, performed during the development of the test protocol, could assure the test is sufficiently severe to exercise the non-linear nature of the finite element code. A secondary purpose of the test can be to show the level of conservatism in current cask designs. A side benefit of this type of test is that the outcome can be used to dramatically demonstrate that casks do not fail catastrophically when subjected to impacts that are significantly beyond the Part 71 tests.

Full scale tests have the advantage of higher public acceptance. They would need to be performed horizontally on a sled track. The impacted target would have a very large mass, but not the mass of the earth, as is the case for drop tests. An added advantage of full-scale testing is the ability to include surrogate fuel assemblies (one or more) in the model and validate the fuel response model together with the finite element model.

Sandia Rating	A
Estimated Costs	
Full-Scale Rail Cask	Very High
Full-Scale Impact Test	High

Scale model tests have lower public acceptance, but they can be used to validate the risk results from NUREG/CR-6672 [3]. It would not be feasible to include scale model fuel assemblies in the scale model cask. The scale model tests could be performed at either a drop test facility that has been used for past certification tests or as a horizontal impact on a sled track.

Sandia Rating	B
Estimated Costs	
Scale-Model Cask	High
Scale-Model Impact Test	High

3. CONTAINER PERFORMANCE DURING FIRES

Based on public concerns and comments and the Sandia technical assessment, thermal issues have been broken into four categories: the pool fire environment, specific fire accident issues, the accident test sequence, and miscellaneous thermal issues. After summarizing the issues in each area, possible analyses, tests, and experiments intended to resolve or improve the state of knowledge in that area are proposed and evaluated.

3.1 Pool Fire Environment

The present regulatory fire test environment described in 10CFR71 has its origins in the 1950s. Since it was developed, the regulation has served well in that no incidents where a severe fire led to a release of radioactive materials from a spent fuel cask or large quantity package have occurred. During the last 20 years, research and experiments have led to an improved knowledge of the large pool-fire environment. The thermal issues enumerated in the public meetings and stakeholder comments involve both statistical issues such as fire duration and phenomenological issues such as effective fire temperature.

3.1.1 Comments and Issues Raised

The following indented paragraphs summarize the comments about fire accidents and the fire environment that were made at four public meetings and in the written materials submitted to the NRC as a result of these meetings.

Several issues directly related to pool fires were raised at the public meetings. One stakeholder stated that a pool fire test should be at least 100 minutes. Additionally, statements were made that flame temperatures of real materials should be considered, and that fire temperature and duration should be related to real-world conditions and materials. A look at hotter-burning materials and how often and how much of them are shipped was also suggested. The statement was made that fuel oil and LP gas provide 90% of the range of fire temperatures seen during accidents. Investigation of the various parameters that govern the thermal flux to the package and a range of parameters was suggested. Consideration of a damaged neutron shield compartment with the compartment flattened out against the inner container, and investigation of plating out of fission products on cask inner walls were also suggested.

Additional comments regarding the original Modal Study were included in an AAR critique issued in 1995 [5]. Issues such as the use of a one-dimensional heat transfer model, and uncertainty in fire duration are flagged as significant issues of concern. One stakeholder [8] expressed concern over fire temperatures used for accident simulations, claiming that flame temperatures over 6000°C may occur during accidents. Another stakeholder [9] requested analysis of a variety of truck and rail casks based on a range of historical accidents. He concluded by suggesting fire duration of up to 8 hours for truck accidents and up to 24 hours for rail accidents be considered. In the historical list of accidents provided, several explosions are listed in addition to fires. An industry group [10] expressed general concern that specific objectives of test and analyses be

identified, costs estimated, and that extra-regulatory tests and analyses be clearly identified as such. They suggest emphasis on new materials, new analysis techniques, and benchmarking of calculational methods.

These comments raise the following four issues:

- (1) What fire durations should be considered for risk-based analyses?
- (2) What effective fire temperatures should be considered for risk studies?
- (3) Should more detailed computer models of spent fuel casks be used for risk studies?
- (4) The cost/benefit ratio of extra-regulatory tests and any rule changes should be examined.

3.1.2 Sandia's Discussion of These Issues

Fire duration is discussed in Section 5.3 of this report. With regard to the suggestion that flame temperatures of up to 6000°C are possible, temperatures measured during actual pool fires do not approach these extremes. Very high flame temperatures are characteristic of premixed stoichiometric flames where the optimum fuel-oxygen ratio exists in the ignited gas mixture. In pool fires, turbulent mixing of air and fuel leads to inefficient combustion and measured pool fire temperatures near 1000°C.

The issue of the combustion temperature during accidents with different fuels could be considered as part of this study. Experience with different hydrocarbon fuels indicates that in open pool fires, fire temperatures are quite similar for a variety of fuels. Collecting data on the effect of fuel type on temperatures in open pool fires could be conducted at a moderate cost.

The use of detailed three-dimensional computer models has become routine, and, although time consuming, can be run on standard engineering workstations. Three-dimensional fire models are available and could be used to model transportation accident fires.

Any study of transportation accident fires should be examined to determine if the data that will be developed will justify the costs incurred by the use of complicated procedures or models. When thermal issue resolution options are discussed, cost estimates are provided.

Some additional comments on the nature of the fire environment could be useful in evaluating the comments. Analysis of fire is complicated by the large differences in the relative sizes (length scales) of the physical phenomena that must be considered. Turbulence and combustion phenomena have length scales with size that range from sub-millimeters to several meters. Air and thus oxygen are introduced into large pool fires through a complex turbulent mixing process that controls both the location and the intensity of the combustion. Because the fuel-air mixing is limited, internal fire temperatures are much lower than stoichiometric limits for well-mixed fuel-oxygen flames. The central region of a pool fire is starved of oxygen, and a vapor dome exists immediately above the pool where evaporated fuel does not have sufficient oxygen to burn

[11]. These issues lead to questions about the location of test casks in regulatory fires. Recently developed analysis tools can be used to examine these issues more thoroughly than before.

Another strong influence in large open pool fires is the presence of soot particles in the flames. Soot is formed through the inefficient combustion process that is typical of large pool fires and plays an important role in distributing the energy within the fire. These particles radiate thermal energy with the characteristic orange-yellow glow observed in fires. Recent studies indicate that the absorption length for thermal radiation in these sooty flames is much shorter than previously estimated [12]. This information permits new, simplified fire models to be constructed for cask analysis.

Because of the soot, pool fires must be modeled as thermal radiation in a participating medium. Large cold objects in pool fires tend to cool soot particles in the boundary region near the object. In turn, the cooled soot particles absorb and radiate incoming thermal energy, and can prevent part of the thermal radiation from reaching the surface of the object. As a result, heat transfer to objects in a fire can be very different at different points on the surface of the object. The blocking of incident radiation depends on the amount of cooling, and thus on the thermal mass of the object. A consequence is that, for a given surface temperature, large, massive objects can receive lower heat fluxes than small objects with the same shape. Soot-cask interactions can now be modeled [13], and these models can be used to examine how the large pool fire environment affects cask performance.

For risk studies, the thresholds for accidental release of gases and particulates are topics of interest. Casks are designed to pass regulatory tests, but are usually capable of performing their protective function far beyond the regulatory limit. Thus, an understanding of the failure characteristics of spent fuel casks during unusually severe, highly improbable accidents would help to refine the accuracy of risk estimates.

Recently developed computer codes such as the CAFE [13] fire model include a computational-fluid-mechanics-based flow solver that calculates the flow field in the fire and the resulting convective heat transfer. As the hot gases from the fire pass near the cold cask, they are cooled. For large objects, the cooling path is longer, and the soot carried in the gas is cooled further. This leads to blocking of incident thermal radiation as discussed above, but it also indicates that heat transfer to large objects should vary with location on the object. For no-wind conditions, heat transfer near the bottom of the object, where little cooling of the soot has occurred, should be higher than the heat transfer near the top, where the cooling effect of the soot particles near the surface has accumulated during the long, upward flow path. Such effects have also been observed in experimental data [14].

To reduce costs, scale models are often employed in structural testing. In such testing, raising the test height for a drop test can provide a good approximation to the increased gravitational field that should be employed for proper scale model testing. In contrast, for thermal tests, simultaneous scaling of both time and surface heat transfer must be performed. This makes accurate thermal scale model tests more difficult to conduct than structural tests. A simple scaling analysis indicates that for thermal testing of a half-scale cask, a fire one-fourth the duration with twice the total heat flux must be used. Making fires shorter is not a problem, but

increasing the surface heat transfer can be difficult, especially for larger casks. Furnaces and radiant heat facilities can be used to increase heat flux to a cask surface, but open pool fires can not be easily modified to provide the correct heat flux.

With proper time and heat flux scaling, temperatures, thermal gradients and resulting thermal stresses can be reproduced in scale model casks, but some features are not easily scalable. For example, if cellular insulation such as polyurethane foam is used, cell size can not be changed for the scale model. For moderate scale changes, this is not a problem, but when cell size becomes large relative to cask dimensions, a decrease in accuracy of the test would be anticipated. In addition, obtaining exact scale models of details such as o-rings and other seals can be difficult. Confidence in leak rate tests performed on scale model casks would also be lower.

3.1.3 Issue Resolution Options

Based on the comments and discussion above, alternatives for resolution of fire environment issues associated with transportation of radioactive materials can be defined. An overall objective would be to incorporate and apply knowledge that has been gained in the decade since the original Modal Study was published in 1987.

The range of temperatures and other environmental effects found in large pool fires and the fire duration required to fail cask seal or spent fuel rod can be best studied through a combination of research, analysis, observation and measurements in such fires.

General objectives of the issue resolution options include the following:

- Address and respond to the thermal issues that were raised at the public meetings
- Summarize and contribute to improved understanding of the fire accident environment
- Confirm and assess the applicability of fire accident models used for risk and regulatory analyses
- Develop and confirm simple fire models for use in risk analyses
- Demonstrate the level of safety inherent existing cask designs through actual fire tests
- Provide input to the overall effort to evaluate the level of risk associated with transport of radioactive materials

3.1.3.1 Analysis Program

At the initial stage of investigation, a survey of recent fire research would be useful in understanding improvements in the state-of-knowledge of large pool fires. The results can be included in a report that summarizes the present state of understanding of the fire accident environment. Stakeholder comments would be addressed in detail, and, where possible, resolved by analysis. Simulations with advanced three-dimensional fire models can be compared to experimental data and cask positions in large fires to confirm both regulatory and extra-regulatory fire conditions. Temperatures critical for risk analysis such as seal degradation temperatures and rod burst temperatures can be summarized for typical modern rail and truck

casks. Detailed accident scenarios will be analyzed for inclusion in accident risk assessments. For communication purposes, the CAFE fire model could be used to produce realistic fire graphics that clearly depict fire-cask interactions. This information would then allow pool fire tests to be designed that could verify the predicted fire environments. Major report writing, review and approval for the thermal task, as well as work supporting overall risk assessment analyses, would be included in this task.

Sandia Rating	A
Estimated Cost	High

3.1.3.2 Pool Fire Environment Test Program

Periodically, advances in analysis methods should be compared to benchmark tests in order to confirm and refine the analysis approach. As part of the proposed study, tests of this nature can be conducted either separately or in conjunction with the needs of other agencies. Where tests examine extra-regulatory conditions, this fact will be clearly delineated in the test plan. For the thermal program, two possible approaches are under consideration. In the first, an actual Type B cask will be instrumented and tested in an open pool fire and data used to demonstrate the safety of the cask as well as obtain experimental data useful in validating analysis methods. In a second approach, a cask-scale inertial calorimeter could be used to gather accurate data on heat transfer to cask-sized objects.

Cask Test Option. For this test option, which would use a real, full-scale, spent fuel cask, an extra-regulatory pool fire test would be conducted. The cask would be instrumented to record temperatures and estimate heat transfer. Instrumentation would consist of interior and exterior thermocouples to determine temperatures and heat fluxes at important locations. Depending on the geometry of the cask chosen, the estimation of heat transfer to the cask surface with the methods of inverse heat conduction may be possible. Because the external geometry of a real cask will be at least somewhat irregular (not a perfect cylinder), precise estimation of the actual heat fluxes to the cask surface during the fire may not be possible. The fire test would be conducted for a time exceeding the 30-minute regulatory fire, measurements of the temperatures of, and heat fluxes to, important components would be measured, and damage to the cask would be assessed. The duration of the test fire would be based on pretest simulations that would determine the times necessary to reach temperatures of interest such as seal degradation temperatures and fuel rod burst rupture temperatures. After conduct of the test, the test results would be compared to the results predicted by the simulations to confirm that the analysis methods used are able to reliably predict the experimental results.

If the cask used in this test is used in a collision test before conduct of the fire test, then installation of instrumentation in the cask could be difficult if the collision damaged the cask significantly (e.g., made opening and reclosing of the cask lid difficult or impossible). If the cask is damaged during collision testing, costs not included in the cost estimate given below for this issue resolution option may be necessary to prepare the cask for fire testing. Finally, if a damaged cask is used, the precision of the thermal simulations of the thermal response of the cask may not be able to be precisely modeled. Thus, this test option is given a rating of B.

Sandia Rating **B (A if an undamaged cask is used)**
Estimated Cost (excluding cost of the cask) **Medium**

Calorimeter Test Option. Precise heat flux data can be obtained using a large inertial calorimeter that has a shape and mass similar to those of typical spent fuel casks. The experimental results would be compared to the predictions of fire analysis codes such as the CAFE [13] code in order to benchmark the predictions of those codes. Large calorimeters can be fabricated from carbon steel plates by vendors with rolling and welding processes. At present, a test of this type with a calorimeter the size of a truck cask is scheduled to be performed during the summer 2000 using DOE funding. Information gathered during this DOE test should be used to support the design and conduct of any resolution option that used a larger calorimeter as a test object. Tests with a larger calorimeter would be useful in determining whether the thermal environments produced by engulfing pool fires are significantly different for truck and rail casks.

Instrumentation for this type of a test is more extensive than for tests with an actual cask because additional thermocouples are required to assess heat transfer to the entire object rather than only temperatures at a limited set of important locations. Instrumentation would consist of interior thermocouples located in a manner to permit estimation of the heat transfer to the entire surface of the calorimeter. The methods of inverse heat conduction would be used to estimate the magnitude and distribution of the surface heat fluxes. Results would be compared to the predictions of pool fire models for rail-cask-sized objects.

A major advantage of this method is that it permits a careful, controlled measurement of the fire environment for cask tests.

Sandia Rating **A**
Estimated Cost (including the calorimeter) **High**

Fire Fuel Type Effects. To confirm the current hypothesis used with extraregulatory accidents and risk studies that open pool fires with hydrocarbon fuels burn with similar temperatures and other characteristics, a series of instrumented large, open pool fires with a variety of fuels could be conducted. Potential fuels would include diesel fuel, kerosene, gasoline, and other flammable hydrocarbons normally transported by truck and rail. Common fire temperature-measurement techniques such as optical pyrometry with Schmidt-Boelter gauges, thermocouple readings (directional flame thermometers and shielded thermocouples), and use of small inertial calorimeters would be used to assess any fuel-to-fuel variations in fires. Performance of these tests would be quite complicated, because assuring that equivalent pool fire conditions, including wind effects, existed during each test would be necessary, so that differences observed could be directly attributed to the fuel type. Although no detailed experimental database for different fuel types in large pool fires exists, experience with hydrocarbon fuel types indicates that temperatures in large pool-fires are very similar regardless of the hydrocarbon fuel used. Therefore, this resolution option is given a rating of B.

Sandia Rating **B**
Estimated Cost **Medium**

3.2 Specific Fire Accident Issues

3.2.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about specific fire accident issues that were made at four public meetings and in the written materials submitted to the NRC as a result of these meetings.

One stakeholder stated that torch-type fires should be considered, and that the torch test should be at least 30 minutes. Another comment was that the rail environment should produce longer-duration fires and a higher frequency of fires, and that it should be noted that rail-transported tank cars are designed to vent and burn so that they don't explode.

These comments raised the following issues:

- (1) Should torch fire tests be considered?
- (2) Should different fire duration and frequency data be used for different transportation modes?
- (3) Differences between radioactive cargo shipments and shipments of other hazardous materials should be noted.

3.2.2 Sandia's Discussion of These Issues

The frequencies and durations of rail accident fires are discussed in Section 5.3 of this report. Although the pool fire is the basis for qualification of Type B casks, other accident scenarios should be considered during risk analysis. Torch fires are of interest to the offshore oil production industry, and research and analyses on this topic performed to examine oil production torch fires could be directly applied to Type B spent fuel cask analysis. The study proposed below provides an opportunity to summarize the knowledge gained in the oil industry, and outlines methodologies that could be applied to cask analysis.

Data on the response of non-radioactive hazardous materials is available from the results of Department of Transportation (DOT) tests conducted on tank cars and tank trucks. The DOT requires thermal testing of the tank car and tank trucks that are used for transport of hazardous materials. The purpose behind these thermal tests is fundamentally different from the purpose of thermal tests conducted on spent fuel casks. The intent of the DOT tests is to assure that explosions of materials such as propane or the sudden release of large quantities of hazardous cargo such as hydrochloric acid can not occur. Safety relief valves on tanks that carry these materials are intended to prevent explosions by venting the hazardous cargo for the duration of the regulatory 100-minute fire, and for some cargoes, the entire tank volume may be vented through the relief valves. The purpose of the DOT regulatory fire tests for tank insulation is to assure that the insulation surrounding the tank limits total heat input so that the relief valves can release the tank contents in a controlled manner. For spent fuel casks, no such relief function is permitted, and only A₂ quantities of the cargo are allowed to be released after the 30-minute pool

fire. The differences in philosophy and approach should be clarified in any study or risk assessment where differences in the response of the containers used to transport non-radioactive hazardous materials and spent fuel are being examined.

3.2.3 Issue Resolution Options

3.2.3.1 Torch Fire Investigation

Whether a torch fire scenario should be considered separately from the open pool fire test can be addressed with a combination of research and existing techniques for analysis. Typical torch fire sources are petroleum and gas pipeline ruptures and safety relief valves on rail tank cars. Through three-dimensional finite-element analysis, the effects of torch-fire boundary conditions on casks can be compared to pool fire conditions. Previous studies of torch-type fires have been studied previously and analysis techniques are already available, so the risk significance of torch fires can be readily evaluated by other programs without special research. Because no new technical information is required for resolution, the rating of this option is C.

Sandia Rating	C
Estimated Cost	Low

3.2.3.2 Truck and Rail Fire Difference Investigation

Analytical methods and advanced fire models can be used to study potential differences between truck and rail fire accident environments. Three-dimensional models of truck and rail casks can be exposed to regulatory and extra-regulatory fire environments, and differences identified. Duration of such fires is a major factor to consider, and this issue is addressed separately in Section 5.3, Accident Scenarios. For example, if a long duration fire could fail a cask and that scenario is not on the event tree, the event tree analysis would need to be updated. Fire duration results would be included in the simulations supporting the risk analysis. Again, the analytical tools for this type of analysis already exist, and, aside from the duration issue, differences between truck and rail environments are well known. Because risk analyses already include such factors in their accident event trees, this resolution options is given a rating of C.

Sandia Rating	C
Estimated Cost	Low

3.3 Accident Test Sequence

3.3.1 Comments and Issues Raised

The following indented paragraph summarizes the comment about the accident sequence that was made at one of the four public meetings.

One commentator suggested that a new test sequence for package testing should be used: first heat the cask (as in a fire) and then puncture it.

The comment raises the following issue:

Are there significant accident scenarios that could lead to a long duration fire prior to a cask puncture or drop so that a modification in the normal regulatory test sequence is warranted?

3.3.2 Sandia's Discussion of These Issues

The current regulatory test sequence consists of a drop test, followed by a puncture test, followed by a fire. This means that a damaged cask must be able to survive a fire after it has been subjected to substantial impact and puncture loads.

Many accident scenarios are possible and a sequence where a fire leads to failure of a support structure, such as a bridge, could occur, which might subject the cask to an impact or puncture event that followed a fire. The frequency of such occurrences would be studied better by the statistical and historical methods discussed in Section 5.3, Accident Scenarios. If such sequences proved to be of concern, modern thermal and impact analysis tools could be used to estimate the damage that such a sequence might cause to a spent fuel cask. For example, simulations of drop and puncture tests could be completed with the high temperature structural properties used in place of the normal temperature properties that are normally used. First, however, an event tree study would need to indicate that the analysis is needed.

If such accident sequences were shown to be sufficiently probable to be of concern and also were predicted by analysis to cause damage of concern to a spent fuel cask, then a test sequence could be performed where an impact test or a puncture test was performed after the cask was exposed to a regulatory fire test. Such a test would be complicated both to design and to perform. It would be complicated to design, because elevated temperatures greatly decrease the strengths of metals. Thus, the time interval between the fire test and the drop or puncture test would have a very substantial impact on the damage caused by the drop or puncture test.

3.3.3 Issue Resolution Options

Current regulations consider a fixed test sequence consisting of a drop test, a puncture test, and a 30-minute pool fire test. Whether other event sequences pose a significant threat and also are sufficiently probable to be of concern should be determined before revising the standard test sequence is considered. If the risk studies described in Section 5.3, Accident Scenarios, were to find that fires followed by collisions were of concern, then the effect of alternative test sequences could be investigated, first by computations and then if shown to be important by test. However, it is not expected that a revised test sequence would be found to be significant. For this reason, the importance of non-standard test sequences should be first examined by computations and examination by experiments should be performed only if the computations suggest there is a serious problem. Because this sequence of events is expected to be quite improbable, and thus to have little effect on risk, examination of this resolution option by performing computations is given a rating of D.

Sandia Rating
Estimated Cost

D (examination by computations)
Low

3.4 Miscellaneous Thermal Issues

3.4.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about some miscellaneous thermal issues that were made at the four public meetings and in the written documents submitted to the NRC as a result of these meetings:

One commentor stated that first responders are there to put out the fire, and wanted to consider complications, such as responders putting water in a cask and inadvertently producing a criticality event. Another comment questioned the conservatism of the Modal Study, and stated that it was not conservative on thermal impacts. The issue of explosions from military munitions and other sources was also raised, and how such explosions could affect radioactive materials shipments.

These comments raised the following issues:

- (1) Are there important actions by first responders that are not currently considered in event trees?
- (2) Was the Modal Study analysis of cask response to fires non-conservative?
- (3) Should explosions be considered as a significant risk for shipments?

3.4.2 Sandia's Discussion of These Issues

The likelihood of inappropriate actions (human errors) by first responders is discussed in Section 5.2.4.3, Human Errors. Although some fire response actions by first responders may be of concern, for example, spraying water on a hot cask and thereby subjecting it to thermal shock, inadvertent criticality caused by filling the cask with water is very unlikely because of the design of Type B spent fuel casks does not easily permit them to be filled with water even if collision damage has caused the cask to leak. Moreover, for every certified cask, calculations have been performed that show that criticality conditions are not reached even if the cask is fully loaded with fresh fuel and fully flooded with water that has optimum moderator properties. Catastrophic failures that would both flood the cask interior and alter the fuel geometry thereby producing a criticality configuration are extremely unlikely as could be demonstrated by a simple event tree analysis.

Because the Modal Study inferred seal and fuel rod temperatures from cask midshell lead layer temperatures, the Modal Study estimates of the heating times required to reach thermal seal failure and rod burst rupture temperatures could only be were qualitative. Whether these estimates were non-conservative will be apparent once the pool fire tests and 3-D thermal analyses described in Section 3.1 have been completed and the results used to calculate these heating times for a steel-lead-steel spent fuel cask.

Explosives are not generally regarded as a threat to massive radioactive materials casks such as spent fuel casks. The explosive pressure wave is typically too fast to cause the cask to react, and temperature excursions are small. Testing in Germany [15] with exploding propane tanks confirms this assessment.

3.4.3 Issue Resolution Options

3.4.3.1 First Responder Investigations

An assessment of the possibility that first responders will increase risk through inappropriate actions can be performed. Such a study would include both actions and lack of actions by local first responders and authorities. If this assessment found that some credible responder actions or inactions could significantly affect cask response, the effect of the actions on cask thermal response could be examined by thermal calculations. Because accident scenarios have been examined and such issues already considered, this options is rated C.

Sandia Rating	C
Estimated Cost	Low

3.4.3.2 Potential for Explosive Damage

Current regulations address fires, but not explosions. The three-dimensional finite-element models of truck and rail casks constructed for the structural analysis tasks could be subjected to a variety of explosive (over-pressure) boundary conditions, and results examined for potential cask compromise. Because previous tests such as the BAM test [15] indicate that casks are not functionally damaged by explosions, this resolution options is given a rating of D.

Sandia Rating	D
Estimated Cost	Medium

4. SPENT NUCLEAR FUEL BEHAVIOR DURING ACCIDENTS

4.1 Comments and Issues Raised

The following indented paragraphs summarizes the comments about spent nuclear fuel behavior during accidents that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

It was stated that spent fuel release fractions should be determined for fuels other than commercial UO₂ spent fuels. For each fuel examined, development of source terms for short and long cooled fuels and average and high burnup fuels was recommended. One commentator stated that Am-241 and Cs-137 were important radionuclides that should be included in the inventories of the fuels examined.

Both meeting comments and written materials submitted to the NRC stated that the effect of fuel assembly construction, impact speed, impact orientation, and cladding brittleness on the damage suffered by fuel assemblies during collision accidents should be investigated. It was strongly recommended that the variation of cladding brittleness with irradiation should be determined.

It was recommended that experiments be performed to determine the behavior of spent nuclear fuel under extreme accident conditions. It was further stated that these experiments should examine real spent fuel rods and real spent fuel pellets, should measure the release of fission products as constituents of vapors and particulates, and should determine the size distribution of the particles that might be released during severe accidents.

These comments raise the following issues:

- (1) Radionuclide inventories will vary with fuel type, burnup, and cooling time.
- (2) Cladding failure mechanisms and probabilities will depend on cladding embrittlement, which increases with burnup, on fuel assembly design, and also on cask impact speed and orientation (e.g., severe side impacts will slam rods into assembly spacers).
- (3) Particle release during collision accidents will be increased by pellet fracturing and decreased by the formation of particle beds and the filtering of particles that must pass through those beds to the location of the rod failure. Large rod failures or circumferential rod breaks may substantially increase particle releases.
- (4) Radionuclide release fractions will be quite different for rare gases (e.g., Kr, Xe), condensible vapors (e.g., I₂, CsOH, RuO₄), and particulates (e.g., fuel fines).

4.2 Sandia's Discussion of These Issues

4.2.1 Radionuclide Inventories

On a per assembly basis, high burnup, 3 year cooled fuel, the hottest fuel that might be shipped if an older first generation spent fuel cask were used, has about 4 times the number of curies found

in average burnup 10 year cooled fuel, which is the fuel most like the average characteristics of the fuel in the current spent fuel inventory. Fuel assembly inventories and thus cask inventories can be calculated for any particular fuel, fuel burnup, and cooling time using the ORIGEN code [16]. For typical PWR and BWR fuels, the precision of the calculated inventories is more than adequate for use in risk analyses.

Because of the precision of ORIGEN calculations, variations in the amounts of specific radionuclides in the inventory can be reliably calculated for any fuel cooling period and any fuel burnup (the small errors associated with the inventories calculated for very high burnup fuels are not significant for transportation risk analyses). By applying an importance screening technique (e.g., radionuclide importance is proportional to A_2 values) to the results of ORIGEN calculations, the set of about 800 radionuclides normally treated by ORIGEN calculations can be trimmed to a much smaller number of risk dominant radionuclides, thereby answering any questions about the correct set of radionuclides to examine during spent fuel transportation risk calculations.

Because ORIGEN calculations can provide a precise inventory for any spent fuel cask under study, no research in this area is warranted. Conversely, because fuel type, burnup, and cooling period can vary widely, generic spent fuel risk assessments should probably perform risk calculations using inventories and decay heat loads for both bounding and average PWR and BWR spent fuels.

4.2.2 Release Fractions

The failure of spent fuel rods during a severe transportation accident would allow fission products to escape from the rods to the interior of the transportation cask. Fission product transport from failed rods to the cask interior has been reviewed by Sprung et al. [3]. That review suggests the following:

1. Collision accidents that lead to cask impacts at high speed onto hard surfaces, will cause significant fracturing of fuel pellets to occur, which will substantially increase the amount of fuel fines in the spent fuel rods being transported in the cask.
2. Escape of radionuclides from failed rods will occur almost exclusively by gasborne transport of radioactive species along with the rod gases that escape from the pressurized rod upon rod failure due to depressurization, or after depressurization as a result of expansion of the remaining rod gases, if the cask and its contents (the spent fuel rods) are heated by a fire.
3. Transport by diffusion is inconsequential by comparison to gasborne transport caused by rod depressurization or by the thermal expansion of rod gases.
4. Transport of radionuclides as constituents of condensible gases (i.e., vapors, for example, CsI) or non-condensable gases (i.e., noble gases, for example Xe or Kr) are both well defined and can be satisfactorily modeled using simple models (e.g., the ideal gas law) and available data (e.g., vapor pressure data for condensible vapors).

5. Transport of radionuclides as constituents of particles is difficult to model precisely because release of particles from failed rods depends on (a) the fraction of the mass of the spent fuel pellets that is present as particles at the time of the rod failure, (b) the size distribution of the particles, (c) the degree to which these particles form particle beds in the fuel-cladding gap and in the internal crack network normally present in spent fuel pellets, (d) the degree to which these beds, if they form, filter particles that must pass through them to reach the location of the rod failure, and (e) on the nature of the rod failure (small crack or circumferential tear).
6. The nature of the rod failure (crack or circumferential tear) produced upon cask impact onto a surface at some specific speed and the probability of that failure are strong functions of cladding embrittlement and impact orientation.
7. Rod failure by thermal burst rupture can be adequately treated using the experimental data of Lorenz [17-20] and Burian [21, 22].

The effect of fuel assembly design on the behavior of fuel assemblies during collisions can be examined by performing cask crash tests and modeling those tests as is described in Section 3, Cask Performance during Collisions. Consequently, the technical issues that pertain to release of fission products from failed spent fuel rods, that are not addressed by studies proposed in preceding sections of this report and that need to be studied, all involve the response of spent fuel rods and spent fuel pellets to the severe impacts produced by high-speed collision accidents.

4.3 Issue Resolution Options

Data on the fracturing of embrittled spent fuel rods does not seem to be available. Impact fracturing of spent fuel pellets has been studied by performing Pellini hammer tests. However, the variation with impact energy of the resulting particle size distributions is not known.

A new aerosol generation and sizing test apparatus has recently been brought on line at the Fraunhofer Institute in Germany in which pellets or rods can be impacted onto an unyielding target at known impact speeds and the particles generated, collected, and sized [23]. Discussions with the German scientists who designed and qualified this test apparatus indicate that the impact fracturing of surrogate spent fuel pellets, when free standing and also when contained in sections of fuel cladding, and the collection and sizing of the aerosols produced by the impacts could be performed using this apparatus. If radiation embrittlement of the cladding sections can be simulated by hydriding fresh Zircaloy tubing in an autoclave, then the following physical phenomenon can all be examined experimentally as a function of impact speed and orientation using this test apparatus:

- fracturing of bare pellets not contained in rod sections upon impact onto an unyielding target,
- fracturing of surrogate pellets in strained rod sections upon rod impact onto an unyielding target,
- formation of particle beds in the rod-cladding gap,
- filtering of particles by those beds,
- escape of particles from the failed rod section,

- the nature of the rod section failures, and
- the size distribution of the particles that escape from the failed rod section.

If parallel data on the fracturing of surrogate and radioactive spent fuel pellets can be developed at Sandia by performing Pellini hammer tests, then the combination of the Pellini hammer test data with the data gathered using the Fraunhofer Institute apparatus should allow the impact behavior of spent fuel rods and pellets to be qualitatively delineated. Then, even though assembly, rod, and pellet behavior during impacts will vary with fabrication details, enrichment, reactor power history, fuel age, burnup, and cooling time, the data developed will allow gross rod failure modes, the particle distribution produced by impact fracturing of fuel pellets, the formation of particle beds, and filtering of respirable particles by those beds to be identified.

Because rod failure, pellet fracturing, particle bed formation, and bed filtration of fuel fines strongly influence the release of radioactive particles during severe collisions and are all poorly defined by available data, this study is technically very important. Moreover, study of pellet and rod behavior during severe accidents was recommended at the public meetings.

Sandia Rating
Estimated Cost

A
Medium

5. HIGHWAY AND RAILWAY ACCIDENT CONDITIONS AND PROBABILITIES

Issues in this topical area raise questions about shipment routes, accident rates, accident scenarios, and transport modes. Routes are important because, for example, population density and accident rates can be quite different for different routes and also for different portions of a single long route. Accident rates are important because radioactive materials can be released from a spent fuel cask only if the cask is involved in an accident. Accident scenarios are important because they determine the severity of an accident and thus whether it can damage a cask enough to cause it to leak. Transport modes are important because accident rates and accident severities are very different for different modes (e.g., highway, railway) of transport.

5.1 Shipment Routes

5.1.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about shipment routes that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

Almost all of the comments made concerned the dependence of accident rates on route characteristics (e.g., rural, suburban, urban) and the fact that the characteristics (e.g., wayside population densities and surfaces) of specific routes can be very different. The use of a Geographic Information System (GIS) to develop route specific information was suggested and discussed at some length. One meeting attendee in a post-meeting written submission named sections of specific interstate highways and mainline rail routes that should be examined (e.g., I-80 from Buffalo NY to Sacramento CA; the BNSF mainline rail route from Kansas City MO to San Bernardino CA). Several meeting participants suggested that the characteristics of highway and railway routes should be developed by GIS analysis of a representative sets of interstate and mainline rail routes. At least one meeting participant stated that it is counterproductive and premature to consider specific routes because they are bound to change, and properly packaged radioactive materials can be shipped along any route.

Sandia believes that these comments raise the following technical issues:

- (1) How should the wide variability of route characteristics along a single route and among different routes be addressed by risk assessments?
- (2) How can GIS methods of analysis be used to examine the characteristics of transportation routes?

5.1.2 Sandia's Discussion of These Issues

Geographic Information Systems allow data that is spatially distributed to be associated with its geographic location. Once this has been done, correlations among the data can be identified. For example, GIS analyses can develop the frequencies of occurrence of urban, suburban, or

rural population densities or of various classes of wayside surfaces (e.g., hard rock, water) along a specific route or a representative set of routes; and, if enough data is available, GIS analyses could determine whether accident rates along a specific and lengthy interstate or mainline rail route depended strongly on wayside population density.

Distributions of urban, suburban, and rural population densities along interstate highways and mainline rail routes were developed for NUREG/CR-6672. The population densities that entered the distributions were developed by performing HIGHWAY [24] or INTERLINE [25] routing calculations that examined over 700 different and real interstate highway or mainline rail routes (HIGHWAY and INTERLINE determine the shortest interstate highway or mainline railway route between two locations and the population densities of the urban, suburban, and rural portions of these routes). Because GIS methods of analysis were not used, the variation of population density with other route dependent data (e.g., accident rates) was not examined. GIS analysis was used during the NUREG/CR-6672 study to develop the frequency of occurrence of hard rock surfaces along three interstate highway and mainline rail routes. Similar analyses could be performed for a larger set of routes to test the representativeness of the NUREG/CR-6672 results. GIS methods could be used to develop route data for the specific shipment routes to support analysis of the risks associated with a specific shipping campaigns. As the Package Performance study is a generic study, if GIS analyses are performed, those analyses would examine a representative set of routes for the modes of transport selected by NRC for study during this project.

The dependence of accident rates on route characteristics is discussed further in Section 5.2, Accident Statistics. The development of wayside surface data, to support the identification of important accident scenarios by construction of accident event trees, is discussed further in Section 5.3, Accident Scenarios.

5.1.3 Issue Resolution Options

No issue resolution options are presented here, because all of the issues related to route characteristics are discussed further in subsequent sections.

5.2 Accident Rates

5.2.1 Background

The risks of transporting radioactive materials are usually examined by performing calculations using transportation risk codes such as the RADTRAN code [26, 27]. The RADTRAN code is frequently used by NRC, DOE, and other organizations (e.g., licensees, contractors) to estimate the risks associated with the transport of radioactive materials. Accident rates are one of the more important RADTRAN input variables that support the estimation of accident risks. The 'accident rate' is the chance (usually expressed per kilometer traveled per vehicle) that a vehicle will be involved in an 'accident.' Because of the way accident data is reported, the term 'accident' generally means a fairly severe event, one that causes a person to be killed or hospitalized, property damage that exceeds \$50,000, an evacuation, or a major transportation

artery to be shut down for more than an hour. Thus, a 'fender-bender' that didn't cause one of these consequences wouldn't be an 'accident' as that term is used here.

NUREG-0170 [28], published in 1977, was NRC's first comprehensive examination of radioactive material transportation risks. That study used a truck accident rate of about 1 accident per million truck kilometers and a rail accident rate of about 0.9 accidents per million rail car kilometers. These values were based on accident data from 1974 and 1975. The Modal Study [1] used a truck accident rate of about 0.4 accidents per million truck kilometers and a rail accident rate of about 0.1 accidents per million rail car kilometers. These values were based on data from 1968 through 1981 for truck accidents and 1976 through 1982 for train accidents. For NUREG/CR-6672, cumulative distributions of truck and rail accident rates were constructed using Department of Transportation Bureau of Motor Carrier Safety (DOT BMCS) data for the years 1984, and 1986 through 1988. For trucks, separate distributions were developed for accidents that occurred in rural and in urban/suburban regions. The rural truck accident distribution had a 50 percentile value of about 0.2 accidents per million truck kilometers and the urban/suburban distribution had a 50 percentile value of about 0.4 per million truck kilometers. The rail accident distribution had a 50 percentile value of about 0.03 accidents per million rail car kilometers independent of wayside population density.

5.2.2 Comments and Issues Raised

The following indented paragraph summarizes the comments about accident rates that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

The appropriateness of different accident databases was discussed. The use of "single point" accident rates, such as the national average values used in NUREG-0170 [28] and in the Modal Study [1], was criticized. It was stated that distributions of accident rates should be used, and that such distributions may be different for urban, suburban, and rural areas, and also different for different seasons of the year. It was noted that the State of Nevada has studied accident rates, finds significant annual variations, and is using a "bounding approach" to accident rates. The Nuclear Energy Institute (NEI) in a letter [10] to the NRC requested that any assessment of accident likelihoods ensure that accident rate data bound the rates in urban, suburban, and rural areas. Use of route-specific accident statistics rather than national averages was suggested. Written comments provided by the State of Nevada [9] requested that accident rates be developed specifically for those portions of the interstate highway and mainline rail systems most likely to be used to transport spent fuel. The incorporation of uncertainties into accident statistics was recommended. It was also noted that, because a train contains many rail cars, train accident rates need to be corrected for train length to obtain rail car accident rates.

These comments raise four issues:

- (1) To what degree should accident rate data be aggregated?
- (2) Should accident rates be developed for specific routes?

- (3) Should bounding accident rates be used in risk analyses?
- (4) How important are the uncertainties associated with accident rates?

5.2.3 Sandia's Discussion of These Issues

5.2.3.1 Aggregation of Accident Rate Data

Accident rates can be very different at different locations and also very different for any specific location during different types of weather or at different times of the day, the week, or the year. Consequently, averaging of accident rate data loses the great variability of real world accident rates. For example, although the use of national average accident rates will yield a reasonable estimate of mean risks at a national level, it will not depict the range of possible accident rates that might apply to shipment over specific routes at specific times.

Average values can be calculated for any set of accident data in a variety of ways. A single average value can be calculated using all of the accidents in the full data set simply by dividing that total number of accidents by the total number of kilometers which were traveled during the number of years when the accidents occurred. Alternatively, as was done by Saricks and Kvitek [29] for truck accidents, truck accident rates can be developed for the rural and non-rural (i.e., rural and urban/suburban) portions of the interstate highway system for each of the 48 states in the continental U.S. This produces 48 rural interstate truck accident rate values and 48 urban/suburban interstate truck accident rate values. For NUREG/CR-6672, this data was used to construct rural and urban/suburban truck accident rate distributions. Then, 200 separate RADTRAN calculations were performed using different accident rates selected by sampling these truck accident rate distributions.

How will the mean result of the 200 RADTRAN calculations that used accident rates selected by sampling the distributions differ from the single rate that could be calculated using the single national average accident rate. Since both results are based on the same set of accident data, the mean result obtained by sampling the distributions and performing 200 separate RADTRAN calculations should be essentially identical to the result that would be obtained by performing a single RADTRAN calculation that used the single national average truck accident rate. What sampling the distributions preserves is a picture of the spread of the possible truck accident risks. Because sampling produces 200 results, that set of results presents a picture of the range of risks that the single calculation is unable to depict.

Accordingly, if a picture of the spread of the individual accident rates in the full data set is desired, then the full set of data should be divided into some number of subsets (subgroups) that contain accident rates that are similar and then average accident rates should be calculated for each of the data subsets. The smaller the number of subsets, the greater the degree of aggregation of the data. Thus, the degree of aggregation of a body of data determines the degree to which the spread of the data is preserved. It also will influence the spread of the consequences and risks that are calculated using the aggregated data. But lessor degrees of aggregation should not significantly change the best estimate of expected risk whether obtained by performing a single calculation and a single national average accident rate or many calculations that use accident rates selected from distributions of subsets of the full set of data.

Although limited aggregation of accident rate data will preserve the range of the risks and consequences calculated using that data, it will not alter the expected (average, mean) result (the average values of the risks or consequences), because, whenever accident rates for less favorable conditions are preserved, so are rates for more favorable conditions. Thus, for example, if accident rates are higher when accidents occur during poor weather on steep, relatively straight, downgrades in the mountains, they will be lower for accidents that occur during good weather on slightly curving roads on relatively level ground. Consequently, whenever a body of accident rate data is used to estimate expected transportation accident risks, greater aggregation of the data will compress the spread of the risk and consequence results calculated using the data but should not significantly alter the expected result. Conversely, if the accident rate data is greatly aggregated, the range of the risks associated with the full unaggregated set of data will not be realistically depicted.

One way to preserve the variability of the full set of accident data is to calculate accident rates for each combination of conditions that will lead to a significantly different rate. For example, accident rates could be constructed for all combinations of principal route characteristics (curvature, grade), wayside population densities (urban, suburban, rural), accident times (time of day, day of the week, season of the year), and types of prevailing weather (snow, ice, rain, sun). If all combinations of these many separate characteristics are examined, then about 200 separated accident rate distributions would be developed. Separate risk calculations could now be performed that used accident rates selected by sampling each of these many different accident rate distributions. This would clearly better depict how the range of risks and consequences would vary with accident rate and the full spectrum of conditions that produce different accident rates. However, a valid representation of the full range of risks and consequences will also be captured by constructing fewer distributions and then sampling from this smaller set of distributions. Using fewer distributions means that the highest and lowest accident rate values will be averaged with other values and thus not preserved. What is lost by sampling from the smaller set of distributions is the tails of the full range of risks and consequences. Thus, accident rate data should be aggregated into a very large set of subgroups only if preservation of the tails of the full distribution of accident rates or the identity of the specific sets of accident conditions needs to be preserved.

5.2.3.2 Specific Routes

In NUREG/CR-6672, risk estimates for four possible real spent fuel shipment routes were compared to the risk estimates developed using 200 generic routes constructed by sampling route parameter distributions using structured Monte Carlo sampling methods. The comparison showed that the risks for the four real routes fell within the range of the risks developed using the 200 generic routes. Additional specific truck and rail spent fuel shipment routes could be examined. Such an examination could strengthen the conclusion reached in NUREG/CR-6672 that the range of the generic route calculations performed for that study encompasses the results for specific real routes. Development of route specific accident rate data could contribute valuable insights when examining a specific shipment. But, since the Package Performance Study is a generic study, extensive examination of specific routes during this study does not seem consistent with the objectives of the study.

5.2.3.3 Bounding Values

Any set of data, for example a set of accident rates, will have an upper bound. The value of the upper bound will be larger than any of the values in the set of data. Use of a bounding accident rate is appropriate if calculation of bounding values of risk or consequences is desired. It is not appropriate for risk analyses where estimation of expected (mean, average) results is the goal.

5.2.3.4 Accident Rate Uncertainties

An accident rate is the ratio of the number of accidents that occurred while some class of vehicles (e.g., semi-tractor trailers) traveled some number of total kilometers to that total number of kilometers. Because of the legal requirements for reporting severe accidents (those where property damage exceeds some specified amount or injuries or deaths occur), it is unlikely that there are significant errors in the reporting of severe truck or train accidents. Because of differences in reporting thresholds, the characteristics of the minor accidents that fall below the reporting threshold will vary somewhat for different reporting agencies.

Accident rates exhibit two types of variability. First, accident rates can take on a wide range of values in the real world. Second, each of these values will have an uncertainty associated with it. Any significant uncertainties in accident rates for trucks or trains will be caused primarily by imprecision in the estimates of the number of kilometers traveled during the years when the tabulated accidents took place, and not imprecision in the number of accidents reported. Since reporting of numbers of kilometers traveled greater than the actual number traveled is not likely (failure to report is more likely than deliberate over-reporting), accident rates are probably slightly conservative and not significantly uncertain. Therefore, so long as the real-world range of accident rates is appropriately captured by the set of accident rate distributions used in the risk assessment, there will be no need to try to estimate the uncertainties associated with the individual data points that enter those distributions because, if estimated, these uncertainties will have ranges substantially smaller than the range (variability) exhibited by any distribution of real-world accident rates.

5.2.4 Issue Resolution Options

5.2.4.1 Dependence of Accident Rates on Accident Conditions (e.g., weather).

The dependence of accident rates on weather conditions, terrain, population density, and time of day, day of the week, and season of the year can be developed. To develop these dependencies, the raw data that underlies both current national and state truck and rail accident statistics and the branch point probabilities on the Modal Study truck and train event trees would need to be minutely reexamined. If conducted on a national scale, such an examination would be a daunting undertaking, because for many states the desired data, if available, would only be available in hardcopy in state or county archives. Therefore, reexamination of the raw data at this level of detail could be extremely labor intensive. If such a reexamination was conducted, the historic accident data could be aggregated into a much larger set of categories than was done in the Modal Study or in NUREG/CR-6672, which would allow the variation of accident

parameters with weather, terrain, population density, and time of day, day of the week, and season of the year to be determined.

For some states, California for example, accident data is coded for date, time of day, day of the week, weather, darkness, and object struck. Although the reporting forms and the database allow entries under each of these headings, some of the fields are often blank because the requested data was not available. This means that the dependence of accident rates on these accident characteristics can be developed only for some subset of all accidents in the database. Moreover, if developed, it may not be easy to show that the statistics for the subset are representative of the statistics for the full set of all accidents.

A study could be performed that would examine truck accident data for at least one state (e.g., California) that records route characteristics and prevailing weather and light conditions in an electronic database. By searching the electronic database, the dependence of accident statistics on these accident conditions could be developed for some subset of the accidents in the database. Then, if the representativeness of the subset could be estimated, one could see whether the mean accident rate per kilometer traveled for the subset was close to the mean for all accidents in that database and also whether the more severe sets of accident conditions found in the subset (e.g., accidents that occur during bad weather on steep downgrades in the mountains) would be expected to lead to consequences so large that estimates of mean accident risks would be increased. Note that for this to happen the consequences of unlikely severe accidents (C_{sev}) that occur under unfavorable conditions must increase relative to the consequences associated with occurrence under average conditions (C_{av}) by more than the probability of occurrence (P_{sev}) of these unlikely severe accidents decreases relative to the probability of occurrence of accidents under average conditions (P_{av}). Mathematically, this means that

$$P_{sev}C_{sev} = Risk_{sev} \approx Risk_{av} = P_{av}C_{av}$$

which can only be true if $P_{av}/P_{sev} \approx C_{sev}/C_{av}$.

Sandia believes that examination of the dependence of accident rates on accident conditions is not likely to significantly alter risk estimates, but might improve the picture of the range of transportation accident severities. Thus, this issue resolution option is given a rating of C.

Sandia Rating	C
Estimated Cost	Low

5.2.4.2 Specific Routes

Examination of specific routes is not expected to significantly alter spent fuel transportation risk estimates. Specific spent fuel truck and rail shipment routes beyond those examined in NUREG/CR-6672 could be examined to confirm that specific route results are encompassed by the range of the results developed using generic routes. If performed, this study should focus on those portions of the interstate highway system and the mainline rail system likely to be used to ship spent fuel.

Sandia Rating	B
Estimated Cost	Low

5.2.4.3 Bounding Accident Rates

Development of a bounding accident rate can be done simply by taking the largest accident rate values in any extensive set of accident rate data (e.g., the ANL longitudinal study [29]) and increasing that largest value by some factor which would be expected to encompass any uncertainties in the data (e.g., a factor of 2). If bounding values are sought for truck shipment accident rates by route segment (urban, suburban, rural), increasing the top values of the distributions for truck accident rates published in NUREG/CR-6672 by the selected factor will provide the needed bounds. Therefore, Sandia does not believe that a study of bounding accident rates needs to be performed.

5.2.4.4 Accident Rate Uncertainties

The uncertainties associated with any specific accident rate can only be developed by scrutiny of the raw data used to develop the accident rate and more importantly of the methods used to collect the underlying data. Doing this would entail trips to the state or county archives where accident rate data is recorded and surveying of the sources of data to identify the errors that might be associated with the raw data. If done for all of the lower 48 states, this would be a time-consuming expensive project that would be expected to show that the uncertainties associated with individual accident rates are not significant when compared to the real-world range (variability) of accident rate data within the lower 48 states. The cost estimate provided here assumes that the study would examine perhaps one highly populated state, one great plains state, and one mountain state. Because this study is not expected to affect spent fuel transportation risk estimates, it is given a rating of D.

Sandia Rating
Estimated Cost

D
Medium

5.3 Accident Scenarios

5.3.1 Background

Because spent fuel transportation casks are massive robust structures, only a very severe accident can cause a spent fuel cask to leak. Accordingly, to estimate spent fuel transportation accident risks, the fraction of all accidents that are severe enough to cause a spent fuel cask to leak must also be estimated.

Accident rate data examines the occurrence of accidents with severities that exceed some minimum reporting criterion. Because, in general, only very severe accidents can fail a spent fuel cask and only quite minor accidents (e.g., fender-benders) are not included in tabulated accident rate data, tabulated accident rate data reflects primarily accidents that will not cause a spent fuel transportation cask to leak.

Estimates of the fraction of all reported accidents that are severe enough to cause a spent fuel cask to leak are developed by examining accident scenarios, where an accident scenario is any sequence of events that leads to a specific set of accident conditions. For example, the following set of events depicts one possible train accident scenario: a train derailment causes the cask car

and a neighboring tank car carrying liquid chemicals to fall off of a high bridge and crash onto hard rock at a speed that fails the seal of the cask lid and punctures the tank car allowing its contents to catch fire. The significance of an accident scenario is that it specifies the accident conditions (impact forces, thermal loads) seen by the cask which allows the scenarios that are severe enough to damage the cask to be identified. After the frequencies of occurrence of the scenarios that lead to significant cask damage have been estimated, summation of these frequencies gives the fraction of all accidents that are able to significantly damage a spent fuel cask.

5.3.2 Comments and Issues Raised

The following indented paragraphs summarize the comments about accident scenarios that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

At the public meetings, examination of weather-related scenarios and cask and fuel loading and unloading accident scenarios was recommended. It was suggested that accident scenarios should reflect emergency response actions (e.g., responders unwilling to put out a fire) and the effects of human errors on accident severity. It was also suggested that the highway and railway route characteristics needed to construct event trees should be developed by GIS analysis of representative sets of truck and rail routes. The availability of rail accident data from the DOT Volpe Center was noted. It was stated that rail wayside conditions are very different from highway wayside conditions; e.g., there are more cuts and gas pipelines frequently share the rail line right-of-way. Development of accident statistics and scenarios for all of the following modes of spent fuel transportation was recommended: legal-weight trucks, rail, heavy-haul truck transport of rail casks, barge shipments, air shipment of NAC legal-weight cask, and dedicated ship transport.

The Nuclear Energy Institute (NEI) in a letter [10] to the NRC asked that extraordinary events not be incorporated into accident scenarios. One meeting comment recommended that accidents with probabilities less than 1 in 10 million per year not be examined.

Written materials authored by Audin, Resnikoff, and Halstead [8, 9, 30, 31, 32] submitted to the NRC following the public meetings suggest:

- that the risks posed by human errors and by specific unusually severe historic accidents should be examined,**
- that correlations between accident conditions and route characteristics need to be incorporated into spent fuel transportation accident event trees,**
- that the probabilities of truck and rail accidents for actual spent fuel shipments might be orders of magnitude higher than the probabilities of general semi-tractor truck and rail accidents,**
- that accident speeds and accident fire durations are likely to be influenced by route wayside population density,**

- that severe truck and train accidents are more likely to occur in suburban areas than in rural areas, and
- that a large number of unusually severe historic accidents (e.g., the collapse of the Mianus River Bridge on 5 March 1985) be evaluated.

The Association of American Railroads provided written copies of a review [33] of the Modal Study conducted on its behalf. The AAR review concludes that the following event frequencies may have been significantly underestimated by the Modal Study:

- Frequency of accidents that lead to significant crush loads
- Explosion frequencies
- Fire frequencies and durations
- Frequency of impacts with massive wayside structures (e.g., columns, abutments)
- Frequency of impacts with couplers during pileup accidents
- Frequency of impacts with rail car frames during pileup accidents
- Frequencies of wayside conditions (e.g., bridges, tunnels, cuts, embankments, flat terrain)

With regard to wayside conditions, the AAR review [33] states that

“Where highways tend to go over hills and down valleys, railroads go around them, or through hills and over valleys. As a consequence, railways frequently follow the path of rivers. In comparison to major interstate highways, one would expect railroads to make deeper and more frequent rock cuts and utilize more frequent and higher bridges to traverse similar terrain... In addition, highways normally have barriers or guard rails to keep highway vehicles from falling into deep cuts. The[re] are no such barriers and guard rails in the rail mode.”

The review also examined the derailment accident speed distribution and the fire duration distribution developed by the Modal Study for train accidents and concluded that derailment accident speeds were likely underestimated and that fire durations may also have been underestimated.

These comments raise ten issues:

- (1) Do the structures of the Modal Study event trees need to be modified to reflect the effects of emergency response actions and human errors?
- (2) Should correlations between accidents conditions (e.g., prevailing weather) and route characteristics (e.g., wayside population density and surface hardness) be incorporated into the Modal Study event trees?
- (3) Should accident scenarios that lead to crush loads be added to the Modal Study event trees?
- (4) Should explosion scenarios be added to the Modal Study event trees?

- (5) Should the Modal Study event trees incorporate scenarios for loading and unloading accidents?
- (6) Should extremely improbable very severe accident scenarios be added to the Modal Study event trees?
- (7) Should unusually severe historic accidents be examined or incorporated into the Modal Study event trees?
- (8) Do the branch point probabilities on the Modal Study truck and rail accident event trees need to be reevaluated using recent accident data?
- (9) Do the Modal Study accident speed and fire duration distributions need to be reevaluated using recent accident data?
- (10) Do the Modal Study fire frequencies need to be reevaluated using recent accident data?

The suitability of the structure of the Modal Study event trees is questioned by issues one through seven. Issue eight suggests that the branch point probabilities on these trees are dated and therefore in need of reevaluation. Issues nine and ten suggest that the Modal Study fire frequencies and accident speed and fire duration distributions are dated and therefore in need of reevaluation.

5.3.3 Sandia's Discussion of These Issues

5.3.3.1 Event Trees

In order to examine the tremendous range of possible accidents, risk analyses construct sets of representative accidents that capture the relevant distinguishing characteristics of each accident and also the diversity of all possible accidents. Representative sets of accidents are often developed by constructing accident event trees.

Truck and train accident event trees were constructed to support the Modal Study [1]. Figures 5.1 and 5.2 present the Modal Study truck and rail accident event trees as they were modified for use in the NUREG/CR-6672 study. Inspection of these figures shows that an event tree depicts an accident scenario as a sequence of events and also gives the probability of each event in the sequence. Thus, a path on the event tree constitutes a unique sequence of events and the product of all of the branch point probabilities for the events on a particular path gives the probability of that accident scenario. For example, in the truck accident event tree shown in Figure 5.1, a truck accident that leads to a collision with a pedestrian is depicted by the uppermost branches of the tree, specifically the branches labeled "Collision," "Non-fixed object," and "Cones, animals, pedestrians." Because the probabilities of these branches are 0.7412, 0.8805, and 0.0521, the chance that this accident scenario occurs, given that any truck accident has been initiated, is 3.4002 percent = $100 [(0.7412)(0.8805)(0.0521)]$, where 3.4002 is called the path (scenario) probability and gives the percent of all truck accidents that follow this path. Since the probability of any accident occurring is not included in this product, the resulting fraction is a conditional probability, that is conditional on the occurrence of a truck accident of any severity and type.

Accident	Type	Surface	Probability (%)	Index	
Truck Accident	Collision 0.7412	Cones, animals, pedestrians	3.4002	1	
		0.0521			
		Motorcycle	0.8093	2	
		0.0124			
		Non-fixed object			
		0.8805			
		Automobile	43.1517	3	
		0.6612			
		Truck, bus	13.3201	4	
		0.2041			
		Train	0.7701	5*	
		0.0118			
		Other	3.8113	6	
		0.0584			
		Water	0.1039	7*	
		0.20339			
		Railbed, Roadbed	0.3986	8*	
		0.77965			
	Bridge Railing				
	Clay, Silt	0.0079	9*		
	0.0577				
	0.015434				
	Hard Soil, Soft Rock	0.0004	10*		
	0.000848				
	Hard rock	0.0003	11*		
	0.000678				
	Small	0.0299	12*		
	Column				
	0.8289				
	Large				
	0.0062		13*		
On road fixed object					
0.1195					
Column, abutment					
0.9688					
Abutment					
0.1711					
0.0042					
0.0382					
Concrete Object					
0.0850		15			
0.0096					
Barrier, wall, post					
4.0079		16			
0.4525					
Signs					
0.5111		17			
0.0577					
Curb, culvert					
3.7050		18			
0.4183					
Clay, Silt					
2.2969		19*			
0.91					
Into Slope					
Hard Soil, Soft Rock					
0.1262		20*			
0.2789					
0.05					
Hard Rock					
0.1010		21*			
0.04					
Clay, silt					
1.3138		22*			
0.56309					
Hard Soil, Soft Rock					
0.0722		23*			
0.03094					
Over Embankment					
0.2578					
Hard Rock					
0.0578		24*			
0.02475					
Drainage Ditch					
0.8894		25			
0.38122					
Off road					
0.3497					
Trees					
0.9412		26			
0.1040					
Other					
3.2517		27			
0.3593					
Overtum					
8.3493		28			
Impact roadbed					
0.6046					
Jackknife					
5.4603		29			
0.3954					
Other mechanical					
2.0497		30			
0.0792					
Fire only					
0.9705		31			
0.0375					
Non-collision					
0.2588					

Figure 5.1 Modified Modal Study truck accident event tree.

Accident	Type	Collision Outcome	Speed Distribution	Impact Surface	Probability (%)	Index	
Train Accident	Highway Grade Crossing				3.0400	1	
	0.0304						
	Collision	Remain on Track				8.5878	2
		0.6404					
		Water				0.1615	3*
		0.20339					
		Clay, Silt				0.0121	4*
		0.015433					
		Hard Soil, Soft Rock, Concrete				0.0008	5*
		0.001018					
		Hard Rock				0.0005	6*
		0.000509					
	Collision Derailments	Over Bridge				0.6192	7*
		0.77965					
		Railbed, Roadbed				0.6192	7*
		0.77965					
		Drainage Ditch				0.3433	8
		0.3812					
		Clay, Silt				0.5071	9*
		0.5631					
		Over Embankment				0.0334	10*
		0.0110					
	All Derailments	Into Slope				0.0168	11*
		0.03713					
		Hard Rock				0.0168	11*
0.01857							
Clay, Silt				1.4379	12*		
0.91							
Hard Soil, Soft Rock				0.0948	13*		
0.06							
Hard Rock				0.0186	14*		
0.03							
Into Structure	Small				0.0465	15*	
	0.8289						
	Column				0.0096	16*	
	0.0034						
	Large				0.1711	17*	
	0.1711						
	Abutment				0.0017	17*	
	0.0001						
	Other				16.4477	18	
	0.9965						
Derailed	Locomotive				3.2517	19	
	0.2305						
	Collision				10.0148	20	
	0.2272						
	Car				0.7099	21*	
	0.596						
	Coupler				0.8408	21*	
	0.596						
	Roadbed				15.9981	22	
	0.3334						
Rollover	Non-Collision				31.9865	23	
	0.7728						
Earth				0.6666	23		
0.6666							
Fire only				0.7300	24		
0.0073							
Obstruction, Other				5.7700	25		
0.0577							

Figure 5.2 Modified Modal Study train accident event tree.

5.3.3.2 Event Tree Branch Point Probabilities

The accident branch point probabilities on the Modal Study event trees were based on truck accident data collected from 1973 through 1983 and train accident data collected from 1975 through 1982 and the branch point probabilities that express the frequencies of occurrence of route characteristics (e.g., the frequencies of occurrence of various wayside surfaces) are based on surveys of California segments of two interstate highways. Because all of this data is now at least 17 years old, it is possible that reconstruction of the Modal Study event trees using more recent data might significantly change the values of the scenario probabilities on those trees.

The risks posed by the transportation of spent fuel by truck and rail were reexamined recently by SNL [3]. The reexamination used the Modal Study event trees to develop representative sets of accidents and accident severity fractions. In the Sandia study (NUREG/CR-6672), the problem posed by the age of the data that underlies the Modal Study event trees was addressed by comparing some of the branch point probabilities and scenario probabilities on these trees to estimates of these parameter values derived from more recent data. Those comparisons suggested that these trees still present a reasonable picture of truck and train accidents and also of the probabilities of occurrence of truck and train accident scenarios (i.e., the tree structures seem reasonable and updating the event tree branch point probabilities would probably not change the scenario probabilities by more than a factor of 2 or 3). However, because of the qualitative and limited nature of the analysis, confirmation of the adequacy of these trees would require reconstructing the trees using recent data.

Because the finite element calculations performed for NUREG/CR-6672 indicated that only high speed collisions with an unusually hard surface were likely to fail a Type B spent fuel cask, Sandia used GIS methods of analysis and U.S. Agriculture Department data to develop new frequencies of occurrence for wayside route surfaces for several multi-state mainline rail and interstate highway transportation routes. This analysis found that hard rock wayside surfaces had higher frequencies of occurrence than those used in the Modal Study. The wayside surface branch point probabilities in Figures 5.1 and 5.2 reflect the results of these GIS analyses.

The AAR review of the Modal Study states that the occurrence frequencies of wayside structures (columns, abutments, other reinforced concrete structures) on the Modal Study rail accident event tree may be significantly in error. Nevertheless, because concrete, even reinforced concrete backed by large amounts of soil (e.g., a bridge abutment), is not a hard surface relative to a Type B spent fuel cask, no attempt was made during the NUREG/CR-6672 study to develop new branch point probabilities for the frequencies of collisions with columns, abutments, and other concrete structures.

The Modal Study rail accident event tree has a path that represents a collision with a coupler. Because cask puncture might be caused by collisions not only with couplers but also with other robust puncture probes (e.g., broken rails), the structure of the Modal Study rail accident event tree may not fully capture the chance that a train accident may lead to the puncture of a spent fuel cask. But tank car puncture data indicates that puncture of tank car shells that are one inch thick is rare. Therefore, puncture of a Type B steel-lead-steel spent fuel cask, which has two steel shells that are each at least one inch thick, is expected to be extremely unlikely.

5.3.3.3 Event Tree Structures

For the Modal Study, a large number of specific historic truck and rail accidents were reviewed in order to develop data about accident velocities, fire durations, and the characteristics of objects struck during collisions. This data was then used to test the reasonableness of the accident velocity and fire duration distributions used in the Modal Study and also of the branch point probabilities for wayside route surfaces on the Modal Study event trees. Estimation of source terms for specific severe historic accidents and calculation of consequences for those accidents was not done.

An accident event tree is an importance sampling scheme that samples the infinite set of real-world accidents thereby constructing a representative set of accidents for analysis. Any event tree can be further elaborated by introducing additional branches. Such elaboration will produce a larger set of representative accidents. Use of this larger accident set will lead to a more detailed depiction of the range of accident risks. However, if the original smaller set of representative accidents was properly constructed, elaboration will not significantly alter the estimates of mean (expected) risk that were obtained using that smaller accident set. Thus, it is not clear a priori that incorporation of event tree branches that express emergency response actions or human errors or additional paths for specific severe historic accidents will improve truck or train spent fuel risk analysis results. Instead, as was done in the Modal Study, when conducting risk analyses, specific accidents should be examined to ensure that the general modeling construct being used (e.g., the event trees and their associated speed and fire duration distributions) encompasses the conditions of these specific accidents and properly reflects their probability of occurrence.

Regional variations in route characteristics (e.g., variation of wayside surface frequencies of occurrence, bridge heights, accident rates, and population densities) and thus correlations between these characteristics can be examined by constructing separate event trees for different regions (e.g., mountain states, great plains states, coastal states), specific routes, and/or route types. The effects of the use of different transport vehicles and operating procedures can also be addressed by constructing separate event trees for each combination of a transport vehicle and a set of operating conditions (e.g., interstate 18-wheel semi-tractor trailers vs heavy haul trucks; regular freight trains running under operating restrictions vs dedicated trains running without operating restrictions, barges, ships, planes). For example, Department of Transportation Volpe Center staff have constructed separate event trees for regular and dedicated trains running with and without speed and passing restrictions on mainline tracks, sidings, and yards. In addition, Volpe Center staff have also developed models that can predict train accident rates on route segments from the characteristics of the segments (e.g., track quality, curvature, grade).

Although the construction of sets of more detailed accident event trees could be done, it is far from clear whether doing so will produce risk estimates that are substantially different from those that would be obtained if the Modal Study event trees were reconstructed with only minimal modifications using more recent accident data. Nevertheless, given that the data used to construct the original Modal Study truck and rail accident event trees, accident speed distributions, accident fire duration distributions, and bridge height distributions is now at least 17 years old, these trees and distributions should surely be reconstructed using more recent

accident data and route data that reflects the characteristics of interstate highways and mainline rail routes that span all major regions of the continental United States, not just two interstate highway route segments located in California. After this was done, introducing elaborations (additional tree branches) into dominant event tree pathways on these revised truck and train accident trees, would allow the effects on overall risk estimates of emergency response actions, human errors, and accident scenarios that depict specific severe though improbable historic accidents to be examined.

5.3.3.4 Distributions

Spent fuel transportation risk assessments require data on accident rates (i.e., overall accident rate per km independent of accident severity), accident characteristics (e.g., collision with the exposed face of a hard rock cut), and transportation route characteristics (i.e., route lengths, the heights of bridges on the route, wayside population densities, and wayside surface characteristics). Because accident probabilities and severities depend strongly on these parameters, the variability of these parameters must be examined. Each of these parameters is subject to two types of variability. First, each of these parameters can take on a wide range of values in the real world. Second, each specific value of any of these parameters has an uncertainty associated with it. Thus, each parameter has a real-world distribution of values and each value that enters the real-world distribution has an uncertainty associated with it.

Because the values of these parameters are all developed from real data, the uncertainty distributions associated with specific values of any of these parameters (e.g., the population density of an urban route segment, the fraction of the length of a rural route segment that lies next to bodies of water) are not likely to be broad. Because the real-world distribution of each of these parameters is broad, the uncertainty range associated with individual values in this distribution is unimportant. Therefore, when performing a risk assessment, the development of the distribution of the parameter's values in the real world is far more important than the development or construction of the uncertainty distribution that is associated with any specific value in the real-world distribution.

5.3.3.5 Human Errors

Spent fuel transportation risks could be significantly affected by human errors, for example, the failure to properly secure the cask lid after loading of spent fuel into the cask and driver errors during operation of the cask transport vehicle. Some human errors should be directly accounted for by accident statistics. For example, if semi-tractor trailer and freight train accident statistics are representative of the types and frequencies of the truck and train accidents that might occur during the transport of spent fuel by truck or train, then these accident statistics should already reflect the human errors that might occur when these spent fuel transport vehicles are operated. Conversely, if human errors during the design, construction, and inspection of spent fuel casks are significant and are not encompassed by the range of accident severities and the radioactive releases associated with the more severe accidents in this range, then the range would need to be adjusted to reflect the possibility that human errors could make some severe accidents more probable and/or more severe.

5.3.3.6 Emergency Response

RADTRAN [26, 27] calculations can model the effects of evacuation and decontamination on accident population dose. Specifically, the time when evacuation occurs, the ground contamination level that leads to evacuation, and the ground contamination level that leads to condemnation of property (permanent interdiction) can all be specified through RADTRAN input. Thus, by varying these parameters, the effect of different emergency response actions on consequence and risk estimates could be examined. However, because the NRC has stated that principal focus of this study is on package response to accident conditions, the effect of emergency response actions on accident population dose is not within the current scope of the Package Performance Study.

5.3.3.7 Transportation Modes

Although most spent fuel shipments will be made by rail or truck, some may involve the use of barges or heavy-haul trucks. Transportation by heavy-haul truck is likely to occur between rail spurs and reactor, temporary storage, or permanent repository sites that are not directly serviced by a rail line. Transport by barge may occur for shipments that originate at coastal reactor sites or reactors located on major rivers. Shipment of power reactor spent fuel in seagoing ships is likely only if the spent fuel is shipped to or from overseas locations. Shipment of power reactor spent fuel by plane is not expected to take place. Ship, barge, and air transport are not within the current scope of the Package Performance Study.

5.3.3.8 Loading and Unloading Accidents

Two types of accidents might occur during loading or unloading of a spent fuel cask. First, a spent fuel assembly might be dropped while it is being loaded into or removed from the cask. Second, the cask itself might be dropped while it is being loaded onto or removed from the transport vehicle. Because it is customary to treat loading and unloading as a facility rather than a transportation activity, accidents that occur during loading and unloading of spent fuel casks at the shipment origin and destination are not normally examined by transportation risk assessments and will not be studied unless NRC broadens the scope of the Package Performance Study.

Current spent fuel shipping practice is to ship spent fuel directly to the shipment destination without any interim storage. Because some spent fuel shipment routes may involve shipment by barge and many reactor sites and some interim storage sites may not be serviced by a rail spur, shipment by barge or rail may require intermodal transfers of the cask, most likely to a truck. Thus, any risk assessment that examines transportation routes that involve intermodal cask transfers will also examine accidents that might occur during these transfers. However, if a cask were dropped during an intermodal transfer, the fall height would almost always be less than 10 meters and the impact would almost certainly not be onto an unyielding surface. Therefore, because cask certification requires that the cask be shown capable of surviving a 10 meter fall onto an unyielding surface without loss of containment, the dropping of a spent fuel cask during an intermodal transfer is not expected to pose any significant risk.

5.3.4 Issue Resolution Options

Two of the issues raised, examination of loading and unloading accidents and of spent fuel transportation by barge and plane are not within the scope of the Package Performance Study. The other issues raised are all amenable to study although most do not lend themselves to study by more than one method.

5.3.4.1 Correlations Among Accident Risk Parameters

The correlation of accident rates with weather conditions, terrain, population density, and time of day, day of the week, and season of the year was discussed in Section 5.2.4.1 where it was concluded (1) that, although these correlations could be developed, the development would entail a costly and time-consuming study and (2) if developed, the correlations would be unlikely to change risk estimates significantly. Correlations are also possible between weather, population density, and terrain. For example, high population densities are unlikely along route segments in the Rocky Mountains. As with accident rates, development of these correlations using all available data would be a daunting undertaking, because for many states the desired data would only be available in hardcopy in state or county archives. Moreover, development of correlations between weather conditions, terrain, population density, and time of day, day of the week, and season of the year should be considered only after the dependence of accident rates on these parameters has been examined, because unless that dependence is strong, these correlations are also likely to be weak and thus to have little effect on risk.

If a study of the dependence of accident rates on other risk parameters, described in Section 5.2.4.1, showed that accident rates depended strongly on at least some other risk parameters, then the accident rate study could be broadened to search for significant dependencies between other risk parameters. Again, although this study might improve the picture of the range of transportation accident severities, it is unlikely to significantly alter risk estimates. Thus, it is not rated very highly.

Sandia Rating
Estimated Cost

C
Low (as an add-on to the accident rate study)

5.3.4.2 Occurrence Frequencies of Route Wayside Surfaces

Geographic Information System (GIS) methods of analysis could be used to develop frequencies of occurrence for route wayside surfaces for representative sets of interstate and mainline rail routes and also for the surfaces of accident locations for accidents in databases. Comparison of these data would show whether the distribution of accident site surfaces is similar to or quite different from the distribution of the wayside surfaces along the representative interstate highway and mainline rail routes. Appropriate combination of these results would then generate an updated set of route wayside surface occurrence frequencies for use in truck and rail transportation accident event trees. Finally, if the analysis suggested that transportation risks might have strong dependencies on regional route characteristics, construction of a few additional event trees might determine whether the use of larger sets of event trees would significantly alter estimates of spent fuel transportation risks.

Occurrence frequencies for man-made wayside structures and the surfaces of cuts (e.g., through rock) can be determined by surveying selected transportation corridors. GIS analyses should provide relatively precise occurrence frequencies for the surfaces of naturally occurring wayside slopes that can be impacted during collision accidents. Comparison of the occurrence frequencies developed by surveying cut surfaces along corridors to those developed by GIS methods would then show whether cut surface frequencies are adequately represented by average wayside surface frequencies (e.g., cuts are likely to go through rock and thus to have rock surfaces).

Accurate determination of the frequencies of occurrence of hard wayside surfaces could alter risk estimates significantly. Moreover, this is an issue called out explicitly during the public meetings. Thus, it is given an A rating.

Sandia Rating	A
Estimated Cost	Medium

5.3.4.3 Human Errors

The frequencies of human errors during the design, fabrication, loading, and inspection of spent fuel casks can be estimated by examining data on the human errors that occur during the design, fabrication, operation, and inspection of other moderately complex pieces of equipment. Introduction of this error rate data into a representative subset of the accident scenarios depicted on the Modal Study spent fuel accident event trees will allow the effect of human errors on the probabilities of these scenarios to be estimated. Comparison of the new scenario probabilities that reflect the possibility of human errors not accounted for by historic accident data to the old scenario probabilities will then allow the significance of these human errors to be estimated.

The influence of human errors on spent fuel transportation risk estimates has not been extensively studied. Rigorous requirements for the preparation and inspection of casks are applied before they are shipped. Therefore, if analyzed, human errors are not expected to have a large impact on risk estimates. Nevertheless, because the effect of human errors on risk estimates is not well characterized, although the effect is not expected to be large, this resolution option is given a B rating.

Sandia Rating	B
Estimated Cost	Low

5.3.4.4 Speed and Fire Duration Distributions

New distributions of initial accident speeds and accident fire durations can be easily developed from recent accident data. New distributions of interstate highway and mainline railway bridge heights can also be developed. Comparison of these new distributions to those developed for the Modal Study would then show whether the Modal Study distributions are still representative of current accident data.

This task could also use GIS methods to develop a distribution of wayside slope heights for a few representative truck and rail routes. Comparison of these distributions to the distributions of

truck or rail bridge heights would show whether the use of a vector sum of initial accidents speeds and impact velocities based on bridge heights is a reasonable way to estimate impact speeds for accidents where the transport vehicle or the cask plunges down a slope. In addition, inspection of the conditions of singular unusually severe historic accidents would then show whether these speed and fire duration distributions encompass the conditions and likely frequencies of occurrence of the severe historic accidents.

Because the Modal Study accident speed and fire duration distributions are based on data that is over 17 years old, these distributions should be reconstructed using recent data. Because reconstruction of these distributions is not expected to change them dramatically, this resolution option is given a B rating.

Sandia Rating	B
Estimated Cost	Low

5.3.4.5 Event Tree Structures and Branch Point Probabilities

Results from the tasks described in Sections 5.3.4.1 through 5.3.4.4 and review of recent accident data would allow new values to be developed for all of the branch point probabilities on the Modal Study truck and train accident event trees. This review would also allow the structure of those event trees to be reevaluated and changed if new important paths were identified or paths on the current trees were shown to be unimportant and thus to be candidates for elimination by collapse into other branches on the tree. After these trees have been reconstructed, comparison of the new trees, especially the probabilities of the accident scenarios important for risk, to the original Modal Study trees would show whether the original Modal Study trees were suitable for use in transportation risk assessments.

Because the Modal Study event trees are now dated, they should be reconstructed in order to determine whether recent data would identify new important accident scenarios or significantly alter the probability estimates for old important scenarios. This is especially true for the rail accident event tree, which may need to be significantly elaborated to capture the effects of terrain, track type, and consist.

Sandia Rating	A
Estimated Cost	Medium

5.3.4.6 Specific Historic Severe Accidents

The occurrence frequencies and the conditions (e.g., speed, impact surface hardness, fire temperature and duration) that characterize a substantial set of historic severe accidents can be estimated and compared to the range of accident conditions represented by the reconstructed truck and rail accident event trees and their associated impact and fire distributions. The comparison would determine whether the reconstructed event trees encompass the conditions that characterize the accidents in the set of historic severe accidents.

Sandia Rating	A
Estimated Cost	Low

6. OTHER TRANSPORTATION SAFETY ISSUES

6.1 Comments and Issues Raised

The following indented paragraph summarizes the comments about other transportation safety issues that were made at the four public meetings and in the written materials submitted to the NRC as a result of these meetings.

Sensitivity to various parameters needs to be studied. Uncertainty should be accounted for in the analysis. When presenting data, include error bars. The analysis should be risk-informed: What increases safety? What adds to safety? Where is the biggest safety “bang for the buck?” We need to bound the studies, and not extend them infinitely.

These comments raise the following issues:

- (1) The parameters that dominate risk estimates need to be identified.
- (2) The uncertainties associated with consequences and risks should be estimated.
- (3) Bounding accidents should be examined; all accidents need not be examined.
- (4) Risk assessment results should be used to increase the safety of spent fuel shipments in a cost-effective manner

Ways to address bounding accidents in risk analyses were discussed above in Section 5.2, Accident Statistics, and Section 5.3, Accident Scenarios. Use of risk assessment results to support the making of cost-effective decisions could be demonstrated by an illustrative case study, but isn't a package performance issue. Accordingly, the remainder of this section focuses on the benefits of performing sensitivity and uncertainty studies when conducting risk assessments.

6.2 Sandia's Discussion of These Issues

Estimates of the risks associated with future spent fuel shipments can at best be qualitative. Consequently, it is important to develop a picture of how qualitative the predictions are. This would normally be done in three steps: (1) Identification of important parameters by a Sensitivity Study, (2) Construction of Uncertainty Distributions for important parameters, and (3) Performance of an Uncertainty Study.

Sensitivity Study. Broad relatively flat uncertainty distributions are defined for all of the input variables that enter the risk calculation. Then, structured Monte Carlo sampling methods are used to examine the effect on predicted risks of sampling from these uncertainty distributions. Because broad flat uncertainty distributions are used, the sensitivity of risk predictions to each input parameter is magnified. This allows all possibly important parameters to be identified.

Uncertainty Distributions. Realistic uncertainty distributions are constructed for all important input parameters by review of technical literature, performance of appropriate experiments, and/or unbiased polling of experts.

Uncertainty Study. Finally, the sensitivity calculations are repeated using the more precise uncertainty distributions that were constructed for each important input parameter. The results of this study, would then be expected to predict with reasonable precision the uncertainties associated with the risk predictions.

Usually, risk predictions are examined qualitatively by performing only the first step, the sensitivity study. Full uncertainty studies are rarely performed because development of precise uncertainty distributions for important input parameters would be expensive and time-consuming. Development of realistic uncertainty distributions for important parameters would be laborious, time-consuming, and expensive because little data is available to use to define the uncertainties associated with most risk input parameters, especially those that determine cask response to severe accident conditions, fission product release, downwind transport of radioactive materials, and the induction of radiation health effects. Thus, to develop semi-quantitative uncertainty distributions for these many parameters is a major task, one that has rarely been undertaken. However, if these distributions can be developed, then rerunning the sensitivity calculations using the more precise distributions will efficiently yield the desired picture of the uncertainties associated with spent fuel transportation risk predictions. Finally, performance of a full uncertainty study would automatically provide a reliable picture of the consequences and the risks associated with the worst credible accidents; and the risks associated with these worst credible accidents would constitute a set of bounding accident risks. In addition, if the sensitivity of various operational choices is investigated by performing some suitable suite of calculations, then a picture of cost-effective ways to conduct the shipment campaign will be developed.

6.3 Issues Resolution Options

6.3.1 Sensitivity Study

If precise estimates of the uncertainties associated with spent fuel transportation risk estimates are needed, then a full uncertainty study (i.e., definition of broad relatively flat uncertainty distributions for all input parameters, performance of sensitivity calculations to identify important input parameters, development of precise uncertainty distributions for important parameters, repetition of the sensitivity calculations using the more precise uncertainty distributions for the important parameters) should be performed. If bounding estimates of uncertainties are sufficient, then only the sensitivity study (i.e., definition of broad relatively flat uncertainty distributions for all input parameters, performance of sensitivity calculations to identify important input parameters) would need to be performed.

Sensitivity Study	
Sandia Rating	A
Estimated Cost	Low

6.3.2 Full Uncertainty Study

If the uncertainty estimates developed by the sensitivity study are so large that the upper bounds on the consequences and risks posed by the more severe accidents are unacceptably large, then a full uncertainty study could be conducted. First, realistic uncertainty distribution would be developed for the set of parameters shown by the sensitivity study to dominate risk estimates. After these distributions had been developed by expert elicitations, analysis, and/or experiments, the sensitivity calculations would be rerun using these more precise uncertainty distributions. Because these distributions are not likely to be broad and flat, their use would be expected to diminish the uncertainties associated with the risk estimates that were obtained from the sensitivity study.

Performance of an uncertainty study will be important if the estimated uncertainty range on risk estimates for the risks predicted for the more severe accidents examined are unacceptably large. As this is not believed to be the case, performance of an uncertainty study is given a rating of D.

Full Uncertainty Study

Sandia Rating

D

Estimated Cost

High

7. SUMMARY, DISCUSSION, AND RECOMMENDATIONS

The analysis methods and results of two NRC studies, NUREG/CR-4829 [1], which is usually referred to as the Modal Study and NUREG/CR-6672 [3], Sandia's recent "Reexamination of Spent Fuel Shipment Risk Estimates," in large measure set the agenda for any new examination of the response of spent fuel casks to severe accident conditions. Thus, this section begins by summarizing the analysis methods and results developed by each study.

7.1 Modal Study Analysis Methods.

The Modal Study examined the effects of mechanical and thermal accident forces on simple representations of a generic truck and a generic rail cask and the magnitude of the fission product releases to the atmosphere that these forces might cause. For each of these casks, finite element analyses were performed for impacts onto various surfaces. The finite element cask models constructed for the Modal Study did not include any details of the cask closure or of any cask penetrations. In fact the casks were modeled as if the lids were rigidly attached to the cask body. Incremental cask failure was assumed based upon the peak level of strain in the inner shell of the steel-lead-steel sandwich wall design of these casks.

The Modal Study investigated the thermal response of each of these generic casks to fires by performing 1-D analyses of the thermal response of the middle portion of the cask for fires with average temperatures of 800 and 1000 C. The effect of the cask position relative to the fire on thermal loads was assessed by simple geometric analyses. Lead layer mid-thickness temperature histories were calculated, but not the peak temperatures attained, which are delayed in time due to continued thermal energy transport through cask components after fire termination. Cask seal area temperatures were not directly calculated, but were inferred from cask design details. Because fuel rod temperatures were not estimated, the fire durations needed to cause rod failure by burst rupture were not estimated.

Accident consequences (e.g., population dose, radiation induced cancer fatalities) were not estimated for the Modal Study. Instead, for each bin in the Modal Study accident matrix, estimates were developed for the number of curies of noble gases, condensible vapors, and particulates that would be released by the accidents that were assigned to that bin. Multiplication of these curie amounts by the bin probability then produced a result termed the curie risk of the bin. Bin release fractions were developed by multiplying release fraction estimates, developed by Lorenz [17-20] from high-temperature burst rupture tests on sections of H. B. Robinson spent fuel rods, by an estimate of the fraction of the fuel rods in the cask that might be failed by the accidents assigned to each bin. This yielded estimates for the fractions of materials in spent fuel rods that would escape to the cask interior. Then, because fission product transport from the cask to the environment was not modeled, all species released to the cask were assumed to escape to the environment undiminished by any deposition to cask internal surfaces (i.e., cask-to-environment release fractions were assumed to be 1.0).

Accident matrix bin probabilities were developed by constructing generic truck and rail accident event trees, determining which scenarios on these trees might threaten the integrity of a spent fuel cask, estimating the impact speed, angle, and orientation and fire size, offset, and duration

that would be required to cause cask integrity to be compromised, and calculating the probabilities of each combination of a scenario and a set of accident conditions that might lead to cask leakage.

7.2 Analysis Methods Used in NUREG/CR-6672

For NUREG/CR-6672, Sandia examined the effects of impact and thermal loads on four generic casks, estimated the magnitudes and probabilities of the source terms that might be produced by unusually severe accidents, and calculated the consequences that would be caused by the release of those source terms. The four generic casks studied were steel-lead-steel truck and rail casks, a steel-DU-steel truck cask, and a monolithic steel rail cask.

Finite element calculations were performed in order to estimate the damage that might be caused by impacts of these four generic casks onto unyielding surfaces. The finite element calculations used simplified representations of each generic cask (e.g., cask penetrations were not modeled; and in order to minimize computational time, lid bolts were represented by square shapes). The size of cask seal failures was estimated from the relative perpendicular and normal displacements of the cask lid relative to the cask body. The strains generated in spent fuel rods by extra-regulatory impacts were estimated by extrapolation of regulatory impact rod strains and comparison of these extrapolated strain values to the rod failure strain criterion published in SAND90-2406 [34]. The results of the unyielding surface calculations were extrapolated to real yielding surfaces by partitioning the available impact energy between the real yielding surface and the cask, and assuming that the damage caused by deposition into the cask of a given amount of energy was independent of the characteristics of the impact surface once energy loss to that surface was properly accounted for.

The time-temperature history of the inner shell of each generic cask was estimated by 1D thermal calculations which modeled only the cask body including the neutron shield compartment but not the cask lid or closure. These time-temperature histories were used to estimate the times required to reach temperatures in the cask closure and in the fuel assemblies being carried in the cask that would cause elastomer seals to fail due to thermal degradation and rods to fail by burst rupture. Because these calculations modeled an engulfing optically dense hydrocarbon fuel fire, the effects of cask offset from the fire, shielding of the cask by the bed of the transport vehicle, and loss of energy from the cask to the ground, were not examined.

A critical review of the values of the spent fuel release fractions developed by Lorenz [17-20] was performed for NUREG/CR-6672. This review developed new estimates of spent fuel release fractions, including a model for release of Cs that reflects release as a constituent both of particles and of vapors. Although the values developed for aerosol release fractions attempted to correct for the effects of particle production by impact fracturing of fuel pellets and CRUD and of particle filtering by the formation of fuel particle beds in the fuel-cladding gap and in any crack network in the fuel pellets, the values developed were at best qualitative.

The truck and train event trees developed by the Modal Study were used with only minor modification of the probabilities of wayside surfaces, especially hard rock wayside surfaces. The

Modal Study frequency distributions for accident speeds and accident fire durations were used without any attempt to show that more recent data would produce similar distributions.

Distributions of route parameters were constructed from the results of HIGHWAY and INTERLINE calculations for the real routes that connect each commercial reactor to six possible interim storage locations and these six locations to three possible permanent repository locations. Values for the aggregate urban, suburban, and rural segments of 200 generic shipment routes were then selected by structured Monte Carlo sampling of these route parameter distributions. Route parameter values were also developed for the aggregate urban, suburban, and rural segments of four real routes. The effects of the use of aggregated route segments on consequence estimates were not examined. Finally, population doses were estimated for each hypothetical severe accident that led to a release of radioactivity by performing RADTRAN calculations for each of the 200 generic routes developed by structured Monte Carlo sampling and also for each of the four real routes. The impact of uncertainties in important input parameters on these consequence estimates was not examined by these calculations.

7.3 Technical Issues Raised by the Modal Study and NUREG/CR-6672

Both the Modal Study and NUREG/CR-6672 used finite element methods to examine cask failure due to impact and 1D thermal heat transport calculations to examine cask and rod failure due to heating by a severe fire. Although these analysis methods are routinely used to examine the effects of mechanical and thermal loads on structures, only a very few comparisons of the results generated by these methods to the results of cask crash and thermal tests have been made. Thus, the use of these methods to predict cask damage due to severe collisions or severe fires needs to be validated by comparing computational predictions to the results of cask crash and fire tests. Because any reexamination of spent fuel cask response to severe accident conditions will be a high visibility program, the casks tested and modeled for the Package Performance Study should have designs very similar to those currently in use or, if at all possible, to the dual-purpose cask designs that are likely to be the designs of choice during future spent fuel transport campaigns.

Failure of spent fuel rods, fracturing of spent fuel pellets and of CRUD deposits, formation of particle beds in the fuel cladding gap and in internal pellet crack networks, and filtering of small particles during transport through these beds to the rod failure all strongly influence the release of radioactive particulates from failed rods to the cask interior. Because very little experimental data exists on which to base estimates of rod failure fractions, impact fracturing of fuel pellets and CRUD, particle bed formation, and bed filtering, both the Modal Study and the Sandia study were forced to use expert judgement and hand calculations to estimate release fractions for particles from failed fuel rods to the cask interior upon rod failure due to impact or burst rupture. Accordingly, rod failure, fuel pellet and CRUD fracturing, particle bed formation inside of fuel rods, and filtering of respirable particles by particle beds should be examined experimentally.

Finally, although the Modal Study conducted extensive analysis of truck and train accident data and used the data to develop event trees and distributions of severe accident speeds and severe fire durations, this data is now quite dated, and in need of reexamination using recent truck and train accident data.

7.4 Tasks Recommended for Study by Sandia

In light of the preceding discussion, Sandia recommends that the Package Performance Study should:

- Demonstrate the validity of the finite element and heat transport computational methods used in prior transportation risk studies to model the impact and thermal response of Type B spent fuel transportation casks by comparing the predictions obtained using these methods to the results of cask crash and fire tests.
- Experimentally examine the failure of spent fuel rods, fracturing of CRUD and spent fuel pellets, formation of particle beds inside of spent fuel rods, and filtering of respirable particles by those beds.
- Reconstruct the Modal Study truck and train accident event trees and accident speed and fire duration distributions using recent accident data.

Cask damage due to impact onto hard surfaces would be estimated by performing 3-D finite element impact calculations on a parallel processing computer using a detailed realistic nodalization of the cask. Cask damage due to exposure to fires would be estimated by performing 3-D heat transport calculations for a detailed representation of both the cask, its closure, and the spent fuel assemblies contained in the cask. In order to demonstrate that these computational methods are able to credibly predict the results of hypothetical severe collision and fire accidents, pretest computational predictions should be compared to the results of crash and fire tests on a large-scale or a full-scale cask.

The behavior of fuel cladding embrittled by autoclaving under hydrogen, of rods coated with simulated CRUD, and of surrogate and real spent fuel pellets, when each is subjected to impact loads should be examined by performing bench-scale experiments that allow rod failure modes, fracturing of the simulated CRUD deposits, formation of particle beds inside of the fuel rods due to fracturing of fuel pellets, filtering of respirable particles by these particle beds, and the size distributions of the particles produced to be determined. Table 8.1 depicts the relationships between these bench-scale experiments and the test crash of a cask that contains a fuel assembly loaded with surrogate fuel pellets.

GIS analyses of shipment routes and accident sites and review of truck and train accident data for the years 1985 to the present should be performed in order to develop the data needed to support the reconstruction of the Modal Study truck and train accident event trees and the accident speed and fire duration distributions that are associated with those trees.

Table 8.2 summarizes the results of the discussion of the issues raised by the discussions held at the public meetings held during the fall of 1999 last fall in Bethesda MD, and Las Vegas and Pahrump NV. Inspection of the table shows that all of the technical issues raised by the methods of analysis and results of the Modal Study and the NUREG/CR-6672 study were also raised by the discussions and comments made at the four public meetings. Inspection of Sandia's ratings of each issue in the table also shows that these ratings are entirely consistent with Sandia's evaluation of the technical issues raised by the Modal Study and by NUREG/CR-6672. Consequently, the options that SNL recommends for study are the same as the set of studies developed by SNL's review of the technical issues raised by the Modal Study and the NUREG/CR-6672 study.

Table 8.1 Relationships between Cask Crash and Rod and Pellet Impact Tests

Process/Phenomenon	Study					
	Pellet Impact Tests		Rod Impact Tests	Rod + Pellet Impact Tests	Cask Crash Tests	Finite Element Modeling of Cask Crash Tests
	Real Pellets	Surrogate Pellets	Embrittled Rods	Embrittled Rods with Surrogate Pellets	Full or Large-Scale Casks with at least one assembly containing unembrittled rods and surrogate pellets	
	SNL	GRS	GRS	GRS	SNL	SNL
Pellet Fracturing						
Size distribution	x	x		x	x	(not modeled)
Dependence on impact energy	x	x		x	x	
Particle bed formation				x	x	
Particle filtering by particle beds				x	x	
Rod failure (type, frequency, dependence on embrittlement)			x	x	x	(not modeled)
Assembly Behavior						
Spacer impacts on rods					x	x
Assembly loads on cask					x	x
Cask Failure						
Closure					x	x
Penetrations					x	x

Table 8.2 Summary of the Issues Raised at the Four Public Meetings

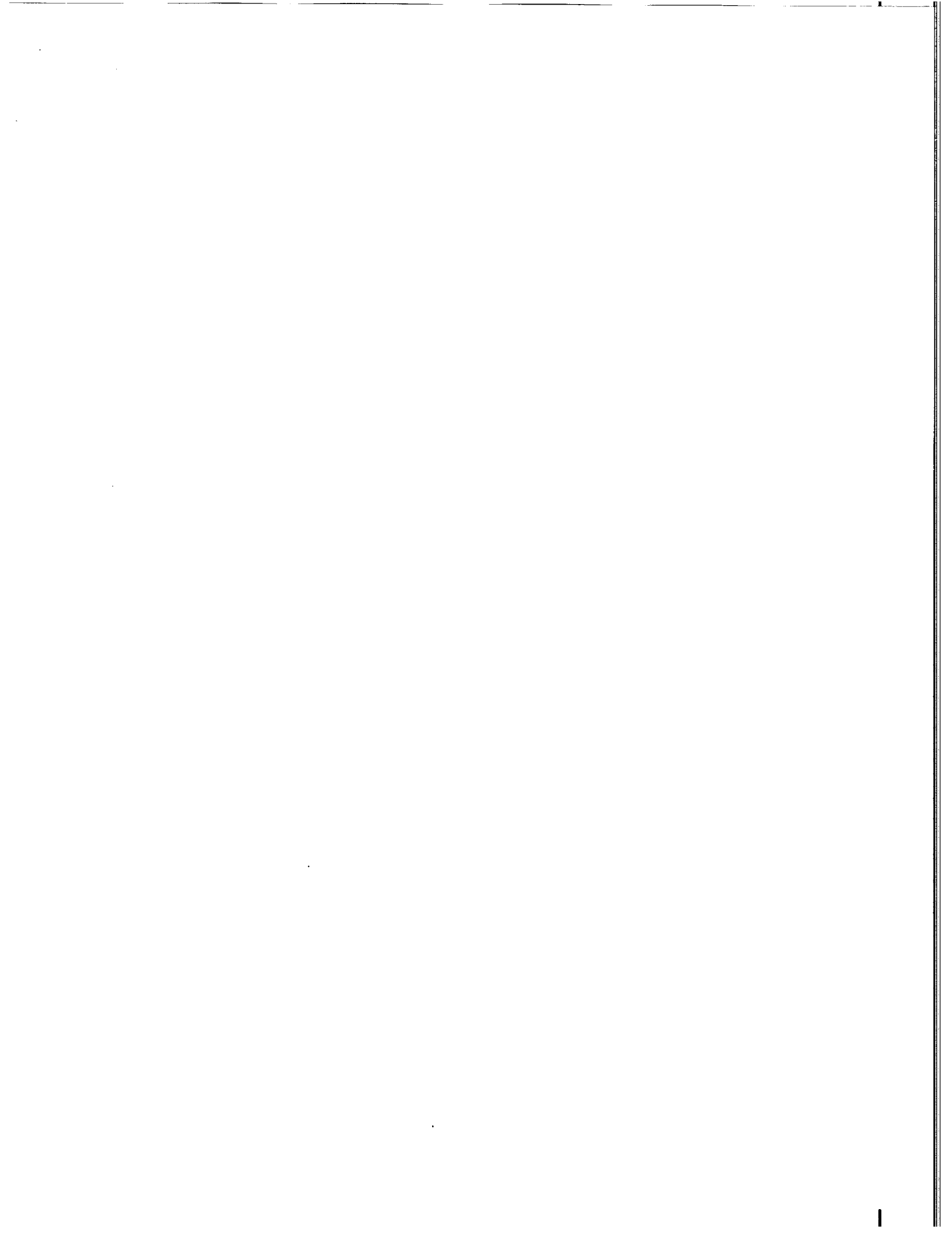
Resolution Option [section where discussed]	Sandia's Rating	Estimated Cost	Recommended Options
Purchase of full scale rail cask [2.9]	A	Very High	X
Full scale rail cask rocket sled collision test [2.9]	A	High	X
Design and construction of 1/3 scale rail cask [2.9]	B	High	
1/3 scale rail cask cable pulldown collision test [2.9]	B	High	
Validation of scale model testing [2.8]			
If a scale model cask is tested	A	Low	
If a real full-scale cask is tested	C	Low	
Finite element modeling of either cask collision test [2.4]	A	Medium	X
Dual-purpose casks (effect cansister, storage) [2.7]	A	Medium	X
Impact response of pellets, rods, and fuel assemblies [4.3]	A	Medium	X
Calorimeter pool fire test [3.1]	A	High	X
3D thermal modeling of pool fire test [3.1]	A	High	X
Cask pool fire test [3.1]			
Undamaged cask	A	Medium	
Damaged cask	B	Medium	
Fuel types [3.1]	B	Medium	
Event tree structures and branch point probabilities [5.2.4.5]	A	Medium	X
Occurrence frequencies of route wayside parameters [5.3.4.2]	A	Medium	X
Specific historic severe accidents [5.3.4.6]	A	Low	X
Speed and fire duration distributions [5.3.4.4]	B	Low	
Human error probabilities [5.3.4.3]	B	Low	
Specific routes [5.2.4.2]	B	Low	
Sensitivity study [6.3.1]	A	Low	
Collisions with non-planar objects [2.2]			
By finite element analysis	B	Medium	
Using NTP and Eiffort results	C	Low	
Impacts onto yielding targets [2.5]			
Analysis by finite element calculations			
Using deformable test cask	B	High	
Using rigid test cask	B	Medium	
Analysis by engineering calculations	C	Low	
Analysis using empirical data	D	Low	
Crushing environments [2.3]	B	Medium	
Characteristics of collision accidents (orientation, impact angle) [2.1]	B	Medium	
Finite element calculations to examine effects of human errors [2.6]			
Using models developed for the Package Performance Study	B	Low	
Using NUREG/CR-6672 models	C	Low	
Differences between truck and rail fires [3.2.3.2]	C	Low	
Torch fires [3.2.3.1]	C	Low	
First responder fire accident actions [3.4.3.1]	C	Low	
Cask damage from explosions [3.4.3.2]	D	Medium	
Accident test sequence [3.3]	D	Low	
Dependence of accident rates on accident conditions [5.2.4.1]	C	Low	
Correlations among accident risk parameters [5.3.4.1]	C	Low	
Full uncertainty study [6.3.2]	D	High	
Accident rate uncertainties [5.2.4.4]	D	Medium	

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ADDENDUM
MEETING COMMENTS AND COMMENT LETTERS

This addendum summarizes the comments made at public meetings about the Issues Report and presents three letters sent to NRC or Sandia Laboratories, that contained comments on that report. The comments made at public meetings are presented first with the source of the comment given in parentheses at the end of the comment. For example, (815AM185-20) means that the comment was made at the daytime meeting held at the Tropicana Hotel in Las Vegas on 15 August 2000 and that the comment may be found in the transcript of that meeting on line 20 of page 185. Similarly, (913AM171-18) means that the comment was made at the daytime meeting held at the NRC Offices in Rockville MD on 13 September 2000 and that the comment may be found in the transcript of that meeting on line 18 of page 171.

NON-RADIOLOGICAL IMPACTS

[During spent fuel] transportation, most of the fatalities [w]on't result from exposure to radioactivity [but from] ... normal accidents. So if we really want to protect public health and safety, let's spend our resources reducing [normal] accident risk by routing and modal choices ...” (815AM220-2)

“... you're going to have your problems, not in 80 mile an hour accidents, but in ... how you transport [the spent fuel], how many people do the inspections, how are the [casks] loaded ... It's going to be accidents that have nothing to do with radioactive material ... where people are going to get hurt and die.” (815AM229-9)

PROGRAM COST

“... public safety should never be compromised by economics.” (913AM171-18)

“... this is a very, very expensive program ...” (815AM227-9)

“... presumably NRC doesn't have enough money to pay for everything. So you have to make some choices here based upon what your overall budget is ... plus what you might get ... from other agencies or other sources.” (815AM155-19).

“How come NRC has to pay for all of these things when there's a vendor that wants to get [his cask] certified and be able to sell them?” (815AM157-20)

“So it's not testing to support any particular vendor's cask .” (815AM158-5)

SABOTAGE

“... we remain concerned that existing physical protection regulations, both domestically and internationally, for [spent fuel] transport are not adequate , because they don't consider what we consider appropriate threats, ...” (913AM95-16)

“[Because] the risk of sabotage is ... one of the ... largest risks of a large-scale spent-fuel shipping campaign, we would like to see cask response to a two-stage sabotage attack [determined, an attack] where an attacker actually gets physical control of a package, is able to penetrate it with a shaped charge, and is then able to insert explosive into the cask cavity...” (913AM175-9)

IMPORTANT ISSUES

“My top priority remaining issue[s are] ... spent fuel, rod and pellet performance under severe accident conditions, [the] effect of high speed collision forces on the cask, ... [and] the thermal impact of an extra regulatory fire, ...” (815AM214-20)

“... we believe ... collisions with non-planer objects ... the speed issue, the characteristics of collision accidents, a review of historical accidents, ... the sensitivity issue ... the midpoint rap accident, the crush environment issue, and the effects of human error [are important].”
(815AM200-25)

COLLISION TESTING

Should It Be Done

“... AAR is not convinced that full-scale testing is needed.” (913AM61-6)

“... what does the additional test really help us with.” (815AM179-6)

“... I believe this test that's been proposed costs a minimum of four to six million dollars, unless [DOE] gives us that old NLI-10 rail cask ...” (815AM188-9)

“So someone has to convince me that it's worth spending five or six million dollars or more to do an end-wise crash of a rail cask.” (815AM191-1)

“[A] truck is cheaper and easier.” (815AM189-17)

“... just how representative is the one cask ...” (913AM42-20)

“Is a single test of a single cask going to instill ... confidence in all other casks?” (913AM41-5)

“... how ... would [you] define a test that would cover many different [accident] scenarios?”
(913AM100-7).

“Those predisposed to be opposed to these issues [aren't] going to accept those results being extrapolated on other casks that are manufactured by other vendors? ... And do you think they will accept the results if you didn't test [the cask] in every orientation ... ? No! (815AM165-3)

Purpose

“Two points on the testing. One, we're talking about testing here for severe accidents, not regulatory testing, ... because the materials of the casks go in regions that are less well known. The second point [is], ... whatever test is done, should be directed at benchmarking calculational methods. The advantage of that is that you can then take the code, the computer code that you have great confidence in or much more confidence, and examine many, many different orientations, many, many different casks, so you really get value out of that test.”
(815AM169-2)

“... can [the test] prove ... that the system meets the regulations as they are set forth.”
(815AM154-14).

“... the test should be able to be predicted by ... models, ... should be ... quarter- or third-scale ... [and should be capable of] ... extrapolation ... to full scale. That's really important. It also should connect to the regulations, ...” (815AM191-15)

“... real world scenarios, ... modeling, [and] scale testing ... should all talk to each other.” (815AM192-2)

“The codes that the industry uses are well benchmarked [in] the area that they are investigating and have to meet the regulatory requirements in that area. ... just simply doing a large-scale or a full-scale test, ... unless you construct it correctly, will not provide you any more information than doing it by a calculation that's well benchmarked already or doing certain component testing of critical components.” (815AM170-7)

“... there's a reasonable presumption that some of those codes don't give us the information we need to be able to predict cask performance in severe accidents. (815AM182-8)

“... we are talking about extra-regulatory tests here, not regulatory tests, and we're also talking about a validation test to demonstrate the capability of the codes to repeat analyses, to predict and repeat analyses.” (913AM50-14)

“... the major areas of uncertainty identified so far really come down to bolt failure, lid deformation, seal failure under certain temperature impacts, and ... some related issues with the fuel. But I'm not sure that ... it would be ... good public policy ... to spend the millions of dollars ... to resolve these issues without at least [doing] a scoping paper that [determines whether] we could do this cheaper by looking at failure thresholds for bolts and seals. (815AM188-24).

“... actual material properties are actually always a higher value than the stated code values. [If you] test a bolt to failure, every one ... is well above the minimum [requirements] specified.” (815AM203-17)

“... if you're looking at lid bolts in the seal area ... [and use] a yield value ... taken from ASME, ... [the real value is] always above that value.” (815AM202-5)

“... is it necessary to use a spent fuel cask? ... could you validate your [finite element] model by using ... a steam turbine or a helicopter ..., thus not having to [test] a cask ... in an extra-regulatory [situation],...” (913AM58-6)

“Five issues ... for collision testing.” “One, rail testing is so expensive,...” “Second, ... is it really necessary to do full-scale cask testing or can we do full-scale component testing? We have identified bolts and seals as a major source of concern.” “Third, ... whether you [test a] truck or rail [cask].” “... the vast percentage of current historical shipments have been by truck.” “... legal weight truck is very, very competitive with rail, ...” “[Fourth,] how you decide the most vulnerable [impact] orientation.” (815AM162-21)

“... with a truck cask, the sideways impact on a protruding surface is probably the most serious – is probably the most vulnerable orientation of a test. It's also the one that's most difficult to do.” (815AM190-21)

Full-Scale or Sub-Scale Cask

“... [is there] an estimate of the difference between the cost of the full-scale test and the half-scale test?” (913AM52-22).

“I assume the reason for ... wanting to do the full-scale is that you don't believe that there is any scaleable capability here in terms of doing quarter- or third-scale testing?” (913AM36-21)

“... when possible, use the data, ... to validate [the] scale model ...” (815AM222-11)

Cask to be Tested

“... we would like to see the full-scale physical testing of casks that would be used in those shipment campaigns (913AM38-25).

“[Because] this study is directly relevant to two specific shipment campaigns of unprecedented scale, ... [we call] for the full-scale testing of the specific casks that are under consideration for those particular campaigns.

“...there is a real advantage in using ... a workhorse cask we have a lot of experience with, like the NAC-LWT, ...” (815AM190-1)

“... you will not get any public confidence benefit by going with an obsolete cask, no matter how you argue that the benchmarking is enhanced.” (815AM190-15).

“... does this proposal ... consider the dual transport -- or the dual-purpose casks...?” “... would there be consideration of the impact of the spent fuel on [a] dual-purpose [cask] canister and on the transport [overpack]?” (913AM126-10)?

Test Conditions

“... test plans [should]fully articulate what you're going to accomplish, how you're going to accomplish it, [and] what it means, ...” (815AM204-16)

“[State] what's the specific technical reason for conducting the test.” (913AM35-26)

“Sandia [should] scope out the pros and cons of testing to failure versus testing to the worst condition that we can document in a historical accident, versus simply doing the regulatory test. (815AM208-14)

“Our organization has been calling ... for a reexamination of ... the assumptions underlying the implementation of [the regulatory] test, mainly ... the presumption that the cask will ... gracefully fail, ... if you increase the severity of the accident, [that]you're not going to have [a] catastrophic failure.” (913AM85-9).

"The key is, ultimately, what forces the casks experience and can the cask withstand those forces." (913AM99-7)

"... we ought to see whether the tests ... reflect the kinds of extra regulatory forces that we think these historical accidents represent. (815AM194-25)

"Is there] a way to bound the forces that are generated in [historical] accidents and then assure ... that the casks can withstand those forces, ..." (913AM61-6)

"If we're going to do testing, ... it should include both collision [and] fire, and ... should be ... scaled ... to some maximum credible scenario, not [to] some idealized scenario ... that we've [never] experienced ... in the real world. We certainly shouldn't be testing ... to destruction, ..." (815AM218-20)

"Do [not] ... test to failure, ... [match test conditions to what the cask would] experience in the transportation operating environment." (815AM206-12)

"... connect [the test] to what would be a real world accident, ..." (815AM206-19)

"... let's gather data on severe accidents, be it highway or rail, ... understand the forces or the dynamics, both mechanical and thermal, that occurred, ... [and] assume that a spent fuel cask ... was involved in the accident. Do we have the data to be able to predict the performance of the cask in those real scenarios?" (815AM193-24).

"PFS will ship all of its spent fuel that goes to the facility by rail. It might need to be necessary to ship small amount of it from the reactor site to the nearest local rail-head via heavy-haul, but that will be insignificant to the total." (913AM113-13)

"[With regard to crush environments,] ... in rail accidents, it's very common to see cars stacked one on top of another, especially if [the accident occurs in] a cut ... , say, at a bridge ... [Therefore], we think a ... crush load test [should be performed]." (913AM103-1)

"... if you're not going to transport by rail, then I'd [drop] the crush load question ..." (913AM109-21)

"Regarding] rail accidents, ... it's fairly common for the track to come up, and you can actually spear something." (913AM114-7).

"... where you do have cars cascading into one another, ... [you could] have a shearing effect on the cask ..." (913AM157-10).

"[Regarding] the probability of a bridge collapsing on a rail car versus a rail car being speared in a derailment -- I mean, intuitively, it just seems to me like there's a greater chance of there at least being a section of track coming against the cask compared to a bridge falling on a cask." (913AM116-23)

Movies

“... will there be films made of these tests, and how will they be used, who will they be given to?” (913AM48-3)

“[Regarding films,] I would urge a very precise description of what is being shown, what was attempted, ...” (913AM47-11)

PELLET, ROD, AND ASSEMBLY, RESPONSE TO COLLISIONS

“... the generic issue, fuel rod and pellet performance under severe accident conditions, [is] my number one remaining issue.” (815AM214-20).

“[this study should examine] fuel pellet response to impacts, fuel pin response to impacts, and then the aggregate fuel assembly response to impacts, ...” (913AM66-21 and 67-10)

“... important in the interpretation of the results of this [test], in that actual fuel wouldn't be used, [is] ... what kind of fuel [will be] tested.” (913AM70-2)

“I was concerned when I heard that ... you're going to use ... surrogate spent fuel in the[se]... tests, ... when you really want to see ... the behavior of spent fuel,” “...how do you deal with the changes in the physical and chemical state of high burn-up or MOX fuels ...” (913AM87-5)

“... how confident are you in being able to extrapolate [the test results to] spent fuel, because obviously you're not going to use spent fuel in this test?” (913AM43-6)

“... on spent fuel rod assembly performance ... we need to [examine] high burn-up fuel, because that is what ... the utility is going to be driving their fuel to ...” (815AM223-12)

“You're going to have ... to demonstrate that you can extrapolate [the test] results [to] higher burn-up without doing additional tests, and if you can't really credibly show that, you're going to have ... to demonstrate that the release fractions [you use] are adequate for the high burn-up fuels ...” (913AM87-23)

“I wasn't advocating the full-scale package test be done with spent fuel in them, but I was suggesting that those kinds of experiments ... have to be done in hot cells.” (913AM91-16)

FIRES AND FIRE MODELING AND TESTING

“... you may want to look at ... not only the cask response [to the fire] but [also] the fire's response to the cask.” “A cask is a huge thermal mass. It's going to significantly affect that fire's performance.” (913AM71-7)

“... if a first responder adopts a let-it-burn policy, the perception of the public is ... we're going to have a much longer fire of greater intensity, ... [which] is just going to burn and burn and burn until we have a problem, and I think, in many cases, there will be a let-it-burn policy adopted.” (913AM79-21).

“... it's disappointing to us to not see an A rating ... for full-scale physical testing of actual casks in fire scenarios.” (913AM72-23)

“... we do have serious concerns, ... [about] the regulatory [fire test] time ... and temperature ... , we feel that ... extra-regulatory tests are [the only] ... indication of how a cask might perform in ... a realistic fire scenario. So, [we] ...again, ... request ... full-scale physical testing for fire. (913AM73-9)

“... we're interested in the fire test ... to know exactly what the response of ... an actual cask would be in a fire situation, ...” (913AM82-6)

“I certainly see the benefit of gaining greater understanding about heat transfer rates, ...” (913AM81-21)

“... to know that it's easier to model a simplified cylinder isn't really very reassuring.” (913AM82-13)

“... torch [fires] would [have] a greater impact than a house fire, which is the temperature of the [regulatory] test right now ...” (913AM130-9)

“... why ... was [the torch fire test] rated as a B?” (913AM72-6)

SENSITIVITY/UNCERTAINTY STUDIES

“... the sensitivity issue [addresses the] question of which test [or study] you do ...” Sensitivity is listed as a less than 100,000 dollar activity. Now, “... if you do [a] sensitivity analysis before you ... firm up this ranking list, you probably would have a good understanding of what's going to affect your results ...” (815AM195-19)

“... scope out the pros and cons of testing to failure versus testing to the worst condition that we can document in a historical accident versus simply doing the regulatory test.” “... do a sensitivity analysis on the cost and feasibility issues associated with ... each [test] threshold ...” (815AM208-18)

“... take this qualitative ranking and quantify it and that can be done with the sensitivity analysis.” (815AM225-20)

“... give ... sensitivity [studies] an A plus rather than a B, ...” (815AM196-4)

“... uncertainty analysis was rated very low, ... that really concerns me, because, ... when we're doing risk assessment, I'd really like to see ... how the errors propagate [through] this modeling process ...” (815AM221-16)

“[When] an enormously complicated probabilistic ... risk assessment com[es] out with a single number without [showing] ... how the numerous elements combine to produce that value [or]... how the final result is dependent on the assumptions, ... [a full uncertainty study] would greatly improve the validity or the credibility of this type of analysis.” (913AM155-6)

“whatever number is produced by this kind of analysis [should] ... have an error bar associated with it, ... no experimental result is meaningful without that kind of error bar.” (913AM156-8).

HUMAN ERRORS

“... the explosion that took place at the Point Beach reactor in Wisconsin, with a dry storage cask, was a human error in a sense that the chemical reaction was missed by the NRC and by the cask manufacturer and by the utility company itself.” (913AM119-15)

“... go through the NRC compliance letter files and look at some of the frequency in which human error issues have been raised, ...” (815AM201-13)

“You may want to be very clear that you're not planning on evaluating ... human error in the transportation mode, such as the truck driver, the locomotive engineer, ... because there is a difference between the personnel who are preparing [the cask] and the personnel who are transporting it.” (913AM122-15)

“... quality control during manufacture should be evaluated separately from the human errors in preparing the cask for transport, ... the only way to ... convincingly address the variability in quality control is to ... take statistical samples of the actual casks that are produced and test them in the same way you would test this first cask.” (913AM123-1).

“... one of the criticisms you will get [regarding] ... your single full-scale cask test is that we don't know whether or not every subsequent cask will be manufactured up to [the same] specs.” (913AM121-15)

“... it would be dangerous to convey by this type of testing that all potential unexpected human errors had been accounted for and evaluated.” (913AM119-25)

“... the public not be ... may be unwilling to extrapolate ... because of the propensity for human error in all the other ... casks that are subsequently manufactured.” (913AM120-7)

ACCIDENT STATISTICS/ROUTES/CONDITIONS

“... if [you] update the old Modal Study historical database, ... [state that no accident has ever caused a cask to leak], because otherwise you're just going to lead people to believe that these things fail in normal transport ...” (815AM205-7)

“... parameters on the highways have changed since that initial evaluation was done. Coming from Illinois, our speed limit is still 55, while in Michigan, just 30 miles away, it's 75, ... plus the fact that Illinois has graced the rest of the country with hundreds of illegal truck driver licenses.” (913AM173-7)

“[Consider a train] derailment that happened back in the '70s, where you had levies [and] tank cars exploding, [what is] the probability of that occurring today, after 20 years of improvements to the type of packaging used in the rail industry?” (913AM150-3)

“... are you considering only domestic accidents, or would ... look abroad to other nations, ... that have relied more heavily ... on a different standard on rail?” (913AM152-18)

“... even 5,000 [spent fuel] shipments a year in a large campaign would be nothing compared to three or four million shipments of [other] radioactive material[s] a year.” (815AM228-15)

“... if significant numbers of shipments are being carried by train, ... would they be dedicated trains?” (913AM104-6)

“... let's get a handle on what the accident rates are along the routes to be used, because what you're using now, five years from now could be totally different, could be less, could be higher.” (913AM138-10)

“... going 80 [or] ... 30 miles an hour is important, but [so] ... is the [impact] surface [the cask is going to run into.]” (815AM198-19)

“[Regarding] specific routes, ... for an adequate consideration of highway conditions ... [should] weather conditions [be considered?]” (913AM142-20)

“... it's important that the routes examined actually lead to Yucca Mountain and actually represent the routes that would be traveled by those shipments, ...” (913AM133-17)

“It's important for people who live along the specific routes that will be used to know what the specific probabilities are of an accident and the risk that is being imposed upon them ...” (913AM136-8)

“It's premature to make definite routing plans.” (913AM109-1)

“... you're never going to be able to give the public a definitive answer on the exact routes and the accident rates along those routes during the timeframes that this material is going to move unless you do it very close to when those shipments are [actually] going to move.” (913AM139-24)

“... if these studies indicated one mode was more dangerous than another, I would hope that the licensing and regulatory structure would take that into consideration ... which [shipment] routes and modes were eventually proposed.” (913AM106-14)

COMMENT LETTERS



OFFICE OF THE GOVERNOR
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September 29, 2000

Mr. Robert Lewis
Spent Fuel Project Office
Mail Stop O13-D13
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Lewis:

Enclosed are the State of Nevada's comments on the Spent Nuclear Fuel Transportation Package Performance Study Issues Report prepared by Sandia National Laboratories. While we generally concur with Sandia's recommendations for further study, we strongly disagree with the proposed approach to collision-impact testing of a full-scale rail cask.

We also believe that Sandia failed to accurately report the full range of transportation risk concerns raised by the State of Nevada and other stakeholders at the Bethesda, MD and Henderson, NV public meetings.

We plan to submit additional comments next week on the Risk Reexamination Report (NUREG/CR-6672) and the draft Public Information Summary Paper.

We look forward to continued involvement with this study.

Sincerely,

Robert R. Loux
Executive Director

RRL/cs
Enclosure

State of Nevada
Agency for Nuclear Projects
Comments on
SPENT NUCLEAR FUEL TRANSPORTATION PACKAGE PERFORMANCE
STUDY ISSUES REPORT (30 June 2000)
Prepared for
U.S. Nuclear Regulatory Commission
By
Sandia National Laboratories

September 29,2000

**Inadequate Background Discussion of Stakeholder
Transportation Risk Issues**

The Issues Report background discussion (Pp. 1-2) does not adequately represent the general spent nuclear fuel (SNF) transportation risk concerns raised by the State of Nevada and other stakeholders at the public meetings held in Bethesda, MD on 17 November 1999 and in Henderson, NV on 8 December 1999.

Nevada and other stakeholders are concerned that the relatively small number of domestic SNF shipments over the past two decades provide scant basis for confidence in the safety of future shipments. The Issues Report fails to provide any meaningful information on historical shipments of SNF in United States. At a minimum, the Issues Report should have presented and analyzed the information periodically reported by the U.S. Nuclear Regulatory Commission. Table 1 summarizes U.S. SNF shipment experience over the past two decades. There have been on average only 70 SNF shipments per year, primarily truck shipments between Eastern U.S. origins and destinations.

Table 1
U.S. SNF Shipment Experience, 1979 -1997

- Amount Shipped: 1,453 MTU (77 MTU per year)
 - Truck Shipments: 1,181 (62 per year)
 - Rail Shipments: 153 (8 per year)
 - Truck Share of Shipments: 89%
 - Rail Share of MTU: 76%
 - Average Truck Distance: 684 miles (82% < 900 miles)
 - Average Rail Distance: 327 miles (80% < 600 miles)
 - Origin & Destination East of Mississippi River: 70% (935/1334)
 - Reactor Sites Shipping SNF: 27 (9 sites >2 shipments)
- Source: NUREG-0725, Rev. 13 (Oct., 1998)

The Issues Report barely acknowledges the magnitude of the expected increase in SNF shipments if the U.S. Department of Energy (DOE) begins operation of the geologic

repository proposed for Yucca Mountain, NV. The Issues Report should have included the estimates of projected SNF and high-level radioactive waste (HLW) shipments developed by DOE and by the State of Nevada. Tables 2 and 3 present DOE estimates ranging from 600 to 2,500 shipments per year, every year for about four decades. Table 4 presents Nevada's estimate of the most probable repository transportation scenario, averaging more than 1,000 shipments per year over about four decades.

Table 2

**Projected SNF/HLW Shipments to Yucca Mountain,
DOE Mostly Truck Scenario,
38 Years (2010-2048)**

- 96,000 Legal-Weight Truck (LWT) Shipments
- 300 Rail Shipments (Naval SNF)
- 2,534 Shipments per Year
- 105,000 MTU Civilian SNF
- 15,000 MTU Equivalent Defense HLW, DOE SNF, Naval SNF, Civilian HLW

Source: DOE/EIS-0250D, July, 1999, Appendix J

Table 3

**Projected SNF/HLW Shipments to Yucca Mountain,
DOE Mostly Rail Scenario,
38 Years (2010-2048) .19,800 Rail Shipments**

- 3,700 Legal-Weight Truck (LWT) Shipments
- 618 Shipments per Year
- 105,000 MTU Civilian SNF
- 15,000 MTU Equivalent Defense HLW, DOE SNF, Naval SNF, Civilian HLW

Source: DOE/EIS-0250D, July, 1999, Appendix J

Table 4

**Projected SNF/HL W Shipments to Yucca Mountain,
State of Nevada Current Capabilities Scenario,
38 Years (2010-2048)**

- 26,400 Legal-Weight Truck (LWT) Shipments from 32 reactor sites (40% of Civilian SNF total)
- 8,200 Rail Shipments from 40 reactor sites (60% of Civilian SNF total)
- 5,900 Rail Shipments from 5 DOE Sites .1,066 Shipments per Year

Source: Halstead, Nov., 2000 (forthcoming), based on PIC, Sept., 1996, & DOE/EIS.: 0250D, July, 1999, Appendix J

As stated at the Henderson meeting, Nevada believes that the Issues Report should discuss the actual accident and incident rates for historical SNF shipments, and the resulting potential for future accidents and incidents. Table 5 presents the historical accident and incident rates through 1990 calculated by Science Applications International Corporation. Nevada is currently updating these rates, but little change is expected because of the small number of shipments and shipment-miles during the decade of the

1900s. Table 6 presents Nevada's estimates of future accidents and regulatory incidents for three repository shipment scenarios.

Table 5

U.S. SNF Accident/Incident Record

- No accidents resulting in releases since 1962
 - No accidents resulting in death since 1971
 - 6 accidents, 47 regulatory incidents, 1971 -1990
 - SAIC calculated accident/incident rates for loaded commercial SNF shipments, 1970 - 1990:
 - SNF truck accident rate: 0.7 per million miles
 - SNF rail accident rate: 9.7 per million miles
 - SNF truck incident rate: 10.5 per million miles
 - SNF rail incident rate: 19.4 per million miles
- Source: SAIC, YMP/91-17, Sept., 1991

Table 6

Projected SNF/HLW Accidents & Incidents

- DOE Mostly Truck National Scenario, 38 Years
 - 129 Truck Accidents
 - 1,935 Truck Regulatory Incidents
 - DOE Mostly Rail National Scenario, 38 Years
 - 433 Rail/ 7 Truck Accidents
 - 866 Rail/ 103 Truck Regulatory Incidents
 - Nevada Current Capabilities National Scenario, 38 Years
 - 199 Rail/ 43 Truck Accidents
 - 399 Rail/ 639 Truck Regulatory Incidents
- Source: Halstead, Nov ., 2000 (forthcoming)

During the Bethesda and Henderson meetings, Nevada presented information on expected changes in future SNF shipment characteristics that could contribute to increases in both the frequency and consequences of accidents. Table 7 summarizes the expected changes in shipment characteristics. The dramatic increases in average rail and truck shipment distances could impact equipment performance and human factors. Challenging route characteristics and operating conditions in the West also could affect transportation safety .

Table 7

Future SNF Shipment Characteristics Projected Shipments to Yucca Mountain (2010-2048) Compared to U.S. Historical Shipments (1979-1997)

- 35 Times More SNF Shipped Per Year
- 8 to 36 Times More Shipments Per Year
- 680% Increase In Average Rail Shipment Distance
- 290% Increase In Average Truck Shipment Distance
- Western Route Characteristics (Mountainous Terrain, Severe Weather Conditions)
- Western Operating Conditions (Higher Speeds, Longer Emergency Response Times)
- Potential Unprecedented Reliance on Long-Distance Heavy Haul Truck Shipments

Nevada also presented information at the Bethesda and Henderson meetings about the potential radiological and economic consequences of severe accidents resulting in release of radioactive materials. The Issues Report fails to provide this information, which is essential to understanding Nevada's (and other stakeholders') concerns about SNF package performance. Table 8 provides DOE's and Nevada's estimates of the radiological consequences of a very severe rail accident in an urban area, using the RADTRAN computer code and varying assumptions. Nevada believes that even more severe accidents are possible, but for purposes of this analysis Nevada accepted DOE's definition of a maximum reasonably foreseeable accident. Table 8 also provides Nevada's estimate of SNF accident economic impacts.

Table 8

Consequences of Credible Severe Accident DOE Maximum Reasonably Foreseeable Rail Accident in Urban Area (Probability 1.4 in 10 million)

- DOE estimated impacts [DEIS, Table 6-12]
 - Population dose (person-rem): 61,000
 - Latent cancer fatalities: 31
(RADTRAN4, 26year-old PWR, mostly stable atmospheric conditions)
- Nevada estimated impacts [RWMA, 6/28/00]
 - Population dose (person-rem): 711,000- 863,000
 - Latent cancer fatalities: 356 -432
 - Economic cost (2000\$): \$63 -108 Billion
(RADTRAN4/5, 10 & 26 year-old PWR, weighted average atmospheric conditions)

During the Bethesda meeting, stakeholders took differing positions on how the Package Performance Study should address the vulnerability of shipping casks to terrorist attacks using high-energy explosive devices. The Issues Report is silent in this regard. In a separate forum, Nevada has petitioned the NRC to reassess the consequences of such attacks [Docket PRM -73-10], and Nevada generally believes that the consequences of radiological sabotage should be addressed in the requested rulemaking. However, a current NRC publication summarizing the Modal Study findings cites an outdated terrorism consequence assessment as an upper bound estimate of a release from a cask involved in a severe accident. [W .R. Lahs,

Transporting Spent Fuel: Protection Provided Against Severe Highway and Railroad Accidents, NUREG/BR-0111 (March, 1987), page 30] Table 9 presents recent DOE and Nevada estimates of the consequences of a successful terrorist attack on a truck cask.

Table 9

Consequences of Successful Terrorist Attack

DOE successful act of sabotage against truck cask in urban area

(High-energy explosive device)

- DOE estimated impacts [DEIS, Pp. 6-33 to 6-34]
 - Population dose (person-rem): 31,000
 - Latent cancer fatalities: 15
(RISKIND, 26-year-old PWR, 90% penetration, average atmospheric conditions)
- Nevada estimated impacts [RWMA, 6/28/00]
 - Population dose (person-rem): 12,700 -329,000 -Latent cancer fatalities: 6 -165
 - Economic cost (2000\$): \$13.5- 20.9 Billion
(RISKIND/RADTRAN5, 26 year-old PWR, 90% & 100% penetration, weighted average atmospheric conditions)

Sandia Recommendations Regarding Full-scale Cask Collision-Impact Testing

The State of Nevada has advocated full-scale physical testing of SNF shipping casks for more a decade. However, Nevada must strongly oppose the Sandia recommendations for collision-impact testing of a full-size rail cask [Issues Report, pages 14-16] as part of the Package Performance Study. Sandia's testing proposal is poorly developed and does not specify selection of a current generation, large (125 ton) rail cask for testing.

At the Henderson meeting, Nevada restated its recommended approach to cask testing. Nevada advocates full-scale physical testing of cask prototypes prior to NRC certification to demonstrate compliance with the NRC performance standards (sequential drop, fire, puncture, and immersion tests). Nevada believes that stakeholders must be involved in all aspects of test planning, including development of cask testing protocols, selection of test facilities, and peer review. In addition to demonstrating compliance with NRC standards, full-scale testing can increase confidence in both qualitative and probabilistic risk analysis techniques, increase public acceptance of shipments, and reduce adverse socioeconomic impacts caused by public perception of risk. Nevada estimates the cost of such testing would be \$8 million to \$15 million for a truck cask, and \$12 million to \$25 million for a large (125 tons) rail cask, including the cost of the cask procurement and preparation, and the cost of test facility upgrades.

In our opinion, Section 2.9 is the least satisfactory portion of the Issues Report. The discussion of comments and issues raised [page 14] does not accurately report the discussions of scale-model and full-scale testing which occurred at the Bethesda and Henderson meetings. Sandia's background discussion of these issues [page 15] is

wholly inadequate, and ignores key references [such as D. Snedeker, Nuclear Waste Transportation Package Testing: A Review of Several Programs in the United States and Abroad, NWPO-TN-004-90(1990)] Sandia also failed to realistically examine testing costs. Nevada believes that the test program proposed by Sandia, using a current generation large (125 ton) rail cask, could cost \$10 million.

Even where Nevada strongly agrees in concept with Sandia, for example regarding the value of beyond regulatory impact testing to evaluate closure or penetration failures which could result in release of radioactive materials, we cannot endorse the proposed approach. We are disturbed by Sandia's premature conclusion that: " A side benefit of this type of test is that the outcome can be used to dramatically demonstrate that casks do not fail catastrophically when subjected to impacts that are significantly beyond the Part 71 tests." To our knowledge, no current generation U.S. casks have been subjected to extra-regulatory impact tests, so there is no basis for Sandia's assertion that casks cannot fail catastrophically. Moreover, catastrophic failure of a cask is not necessary to result in a release of radioactive materials sufficient to cause hundreds of latent cancer fatalities and billions of dollars in cleanup costs.

Section 2.9 of the Issues Report fails to answer the following critical questions: Why should a rail cask, rather than a truck cask, be tested? Which available rail cask, if any, is most representative of the rail casks which will be used for future shipments? Why should a head-on collision impact be evaluated, rather than some other impact configuration? Why should the test be performed horizontally on a sled track, rather than dropped onto an unyielding target? To what extent should cost constrain the selection of the rail cask to be tested and the selection of the testing facility?

Most importantly, Sandia apparently does not understand the stakeholder comments that full-scale testing, in and of itself, will not necessarily result in higher public acceptance. An ill-conceived testing program, using an obsolete or unrepresentative cask, will only further deepen public cynicism,

Sandia Recommendations Regarding Full-scale Cask Pool Fire Testing

The State of Nevada supports, with conditions, the Sandia recommendation for an extra-regulatory pool fire test of "a real, full-scale, spent fuel cask" as part of the Package Performance Study. [Issues Report, pages 21 -22]

Nevada support is conditioned upon use of an undamaged, currently-licensed truck cask such as the NAC-LWT or the GA-4, and meaningful stakeholder in development of the testing program. Nevada estimates that such a test would cost about \$4 million

A new Nevada contractor report, "Spent Nuclear Fuel Shipping Cask Performance in Severe Fires: Performance Envelope Analysis, Fire Environment Modeling, and Full-Scale Physical Testing," by Prof. Miles Greiner, Mechanical Engineering Department, University of Nevada, Reno, will be submitted to NRC upon publication.

Sandia Recommendations Regarding Spent Nuclear Fuel Behavior During Accidents

The State of Nevada strongly agrees with Sandia's recommendations regarding further study of pellet and rod behavior during severe accidents. [Issues Report, pages 30-31] The implications of higher fuel burn up and variation in cooling time require additional, specific attention.

Sandia Recommendations Regarding Accident Conditions and Probabilities

The State of Nevada believes that Sandia's discussion of accident rate issues [Issues Report, pages 35-36] does not adequately respond to stakeholder comments made at the Bethesda and Henderson meetings. Sandia merely reasserts the purported merits of the approach used in NUREG/CR-6672 (development of risk estimates for four possible real shipment routes and 200 generic routes constructed using Monte Carlo sampling methods).

Nonetheless, Nevada generally agrees with Sandia's recommendations for future work in this area, especially further studies of occurrence frequencies of route wayside surfaces and specific historic severe accidents. Nevada believes that further study of human errors should be given an A rating, rather than the B rating assigned by Sandia.

September 26, 2000

Mr. Robert Lewis, Mailstop O13-D13
Spent Fuel Project Office
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Comments to Spent Nuclear Fuel Transportation Package Performance Study Issues Report

Dear Mr. Lewis

Lincoln County and the City of Caliente, through their Joint City/County Impact Alleviation Committee have reviewed the subject report and offer the following comments thereto.

General Comments

1. Given the results of the NRC's draft report entitled "An Updated View of Spent Fuel Transportation Risk" (wherein the NRC concludes that the current estimate of the exposure risk of transporting spent nuclear fuel is less than the level of risk estimated in 1977 by NRC and that both the 1977 and 2000 estimated levels of risk are considered acceptable), why is the NRC considering spending limited federal resources to study alternatives to further reduce exposure risks? Rather, the NRC might consider spending funds to cooperate with the Department of Transportation to reduce accident rates and related fatalities. Transportation accident fatalities represent the single greatest public health and safety consequence of the Yucca Mountain radioactive waste management system.
2. As the entity which might actually perform several of the recommended studies identified in the document, the conclusions of Sandia must be called into question. It is not clear to what extent the professional biases of the authors may have influenced the recommendations for further study contained within the report. An independent peer review panel might be considered to validate the Sandia recommendations.
3. A stated objective of the recommended studies is to "increase public confidence in spent fuel transportation safety". Where is the empirical evidence that the public lacks confidence in spent fuel transportation safety? To provide a justification for doing studies to enhance public confidence, the NRC should present solid evidence (other than the remarks of a few individuals at public meetings) that a lack of confidence does indeed exist.

4. NRC is a regulator, vested with responsibility to protect public health and safety. It is not clear that the NRC is obligated to develop information and educate the public to enhance public confidence in the safety of transporting things nuclear. These activities can be easily construed to cast the NRC as being partial to the nuclear industry. Lincoln County and the City of Caliente encourage NRC to demonstrate a strict neutrality in order to build and maintain public confidence in the NRC's licensing process as an effective means to protect public health and safety.

Specific Comments

1. Page i, 3rd Paragraph - Two issues and concerns that were raised during public meetings in 1999 but 'not included in this list include sabotage and terrorism and puncture damage to casks. These issues should be addressed within the document.
2. Page ii, Table E-1 -The items included in Table E-1 are presented in groupings which in some cases involve activities which must be done collectively, if at all. For example, here is little merit in purchasing a full scale rail cask if the rocket sled collision test is not to be performed. The report should make clear that these activities are not mutually exclusive and that their combined cost would need to be incurred. All other linked activities should be clearly denoted on Table E-1.
3. Page 1, 4th Paragraph-The third sentence of this paragraph indicates that ... "some stakeholders may still have questions or concerns ...". The NRC should document the extent of stakeholder concern as a means to justify the expenditure of scarce monies on further studies. The NRC should determine whether any amount of information will eliminate all stakeholder concerns. To what degree does NRC desire to increase public confidence?
4. Page I, 4th Paragraph -It is not at all clear that the recommended research included on Table E-1 will abate the questions and concerns of "some stakeholders". It is clear that the European crash tests and related films did not abate stakeholder concern. In fact, certain stakeholders discredit the European crash tests as nothing more than propaganda. Is the NRC sure that the completion of any of the Sandia recommended studies will be viewed as anything more than propaganda? NRC should carefully consider the value of completing the studies recommended by Sandia.
5. Page 3, Table at Bottom of Page -Although the text makes clear that a primary goal of the Package Performance Study is to perform studies that will enhance public confidence, the definition of ratings assigned to resolution options does not include any consideration of the value of the option in terms of instilling public confidence. The various studies should be reevaluated to determine extent to which each mayor may not enhance public confidence. In fact, completion of some of the recommended studies, and the manner in which the results are presented, may serve to erode public confidence.

6. Page 5, Section 2.2 - This section should also consider puncture of casks (i.e. from rail)
7. Page 9, Section 2.4.3 - The text here suggests that generic cask designs could be used for finite element modeling. NRC should be cautious of the public confidence building value of any modeling or tests on cask designs other than those which are now or are likely in the future to be certified. Concerned publics may be unwilling to extrapolate the results from modeling on generic cask designs to those currently or planned for actual use.
8. Page 13, Section 2.8.1 - Here the text asserts, "WIPP represents the only acceptable transportation campaign, because there was full-scale testing of the TRUPACT-II." Where is the empirical evidence that full-scale testing of the TRUPACT-II and an acceptable transportation campaign are causally related? Does acceptable transportation campaign mean no opposition, no concerns or no questions by "some stakeholders", In fact, not all stakeholders accept the WIPP shipments. If some opposition and concern fits within the definition of "acceptable", than past arid proposed shipments of spent nuclear fuel must also be considered acceptable.
9. Page 14, Section 2.8.3 - The importance of scale model testing in the airline industry is overlooked in this section. Full-scale crash tests of airliners have rarely (if ever) been completed yet millions of people have determined the risks of flying to be acceptable. The airline industry would suggest that full-scale tests are not required to garner public confidence.
10. Page 15, 5th Paragraph - The last sentence of this paragraph suggest that a test of a single cask will "dramatically demonstrate that casks do not fair'. In fact, for certain stakeholders, the test of a single cask will merely demonstrate that the single tested cask did not fail and will provide no reassurance that any other cask might not fail. It is also likely that certain stakeholders will be unwilling to extrapolate the results of a single cask test to other models of casks. The word casks in this sentence should be replaced with the phrase, "the tested cask".
11. Page 21, 3rd Paragraph - It is not clear whether the cask to be used in the fire test is the same cask used in the crash test. Because a crash followed by a fire is a realistic scenario, use of the same cask for both tests may be prudent,
12. Page 32, Section 5.1.1 - This section misses an important point that was raised during the meetings in 1999. Specifically, NRC was advised that Lincoln County and, the City of Caliente had retained the University of Nevada Las Vegas Transportation Research Center to conduct route segment specific RADTRAN risk assessments. One important outcome of the UNL V work was the identification of underestimation of population densities in rural areas of Nevada. The use of Census data (ie. block data) to establish population densities within transportation corridors underestimates actual population density. This is because most residents in the Census block reside near transportation

infrastructure, yet for rural Nevada the Block areas are quite large, including much undeveloped land. The result is that population densities appear much less than actually occur along transportation routes. When appropriate adjustments are made to population density, areas formally considered rural may become suburban. This has a significant outcome on the RADTRAN calculations of risk.

13. Page 37, 3rd Paragraph - The fifth sentence of this paragraph suggests that over-reporting of kilometers traveled by trucks "is not likely". Does Sandia or NRC have any evidentiary data to validate this critical assumption?
14. Page 41 - The American Association of Railroads (AAR) comments challenge the notion that rail is safer than truck. AAR implies that rail accidents are more severe and produce greater consequences. Is a possible conclusion that legal weight trucks are as safe or safer than rail for transporting spent nuclear fuel? Because of the significance of such a conclusion, reevaluation of the comparative exposure risks for rail vs. legal weight truck should not be dismissed by Sandia.
15. Page 48, Section 5.3.3.6 - Package response to a prolonged fire is clearly an important issue relating to accident conditions but also to actions of emergency first responders; If emergency first responders do not attempt to suppress a fire engulfing a cask, the exposure consequences from a resulting seal failure might be significant Failure to consider how emergency first responders my impact upon cask performance would be a major oversight of any subsequent study.

We trust that these comments will prove helpful as NRC evaluates the need for and scope of future studies of spent fuel transportation package performance.

Sincerely,



Dan Frehner, Chairman
Lincoln County Commission

cc: Members, Joint City/County Impact Alleviation Committee
Dr. Mike L. Baughman, Intertech Services Corporation
Affected Units of Local Government
Nevada Nuclear Waste Project Office

August 3, 2000
1952 Palisades Drive
Appleton, WI 54915

Jeremy Sprung
Sandia National Lab: Public Comment on June 30, 2000

“Spent Nuclear Fuel Transportation Package Performance Study Issues Report”
done by Sandia, and on the attached summary of the NRC, March 2000,
“Re-examination of Spent Fuel Shipment Risk Estimates” (NUREG/CR-6672)

1. An important issue missing from both of these reports is the design of dual-purpose casks that all the utilities want to use. It seems to me that you can't possibly report on the performance of transportation casks until this missing part of the puzzle is put in the reports. Are there any dual-purpose casks certified? Any in use? Where? How long? How do the vendors' designs differ? The future of spent fuel is in storage-transport casks, yet there is hardly a mention of this in these reports. Why not?? It is a major issue.
2. Another essential concern is the condition of the spent fuel at the time of transport. Why isn't that clarified? The NEI is pounding at the NRC door begging for cask certification as fast as possible. They want generic rulemaking thrown out. They want the amendment process of rulemaking thrown out. They would just like to see it all go through a Federal Register notice apparently. They also want a lot of new types of cladding material accepted as generic. Now, if storage casks are going to be certified in such a streamlined form, with all kinds of cladding put in them, where do we have any standardization and integration in the system so that studies can predict the future of any of this at all? *Spent fuel has a memory. Everything that happens to it affects it. Long term storage in different pool temperatures, and different pool chemicals, at each reactor, may have different effects. Long term storage in different cask designs may have different effects. No dry storage cask has ever been unloaded as far as I know. We aren't sure what is really happening to spent fuel in those loaded casks yet. And we don't really know if there will be surprises when unloading, cooling, steam from quenching, etc., is done. We don't really know what happens to pinhole leaks, hairline cracks, blisters, crud, etc. over the long term, before any of this spent fuel goes in trucks, barges, or trains. We don't know how the freeze-thaw temperatures of casks on pads over many years will affect the so-called “dual-purpose” designs. We don't know if the bolted seals will last, or if the welds, with “acceptable” flaws, will hold for 20 or 40 years when casks are licensed and re-licensed. We aren't sure how fuel reacts in the “wet-to-dry” cycle over the years. (Wet in the pool, dry in cask storage, wet in unloading in the pool from storage-only casks, dry in transport, wet in unloading again – etc., etc.) --- Think of a wet, mossy rock coming out of a stream – as you set it in the sun to dry – things become brittle and flake off. So – how will crud and coatings, and whatever else is on the fuel and in cask interior after all those years in the pool

and storage, react? Will it fall off? Will blisters reveal holes when they dry up and fall off? What happens to CRUD? What happens to all these new cladding types that apparently have not been long term tested?

Some spent fuel will come from the pool, some from storage-only casks, some from “dual-purpose” casks (that have been stored), some fuel is failed, some is brittle. There are a lot of possible conditions. Can this spent fuel really go on our roads, rails, and waterways, and not fall apart as it is handled and re-handled, loaded and unloaded, and jostled down bumpy roads and tracks? Condition of the pellets and cladding, of the assemblies, of the baskets, of the canisters, of the seals – we don’t know a lot of this! These are new cask designs, few even fabricated, much less long term tested.

You know a lot about fuel in the pools, going right to small transportation casks used in the past, but that is not what is going to happen. The plan is for big, heavy road and rail casks with a lot more spent fuel in them. Will the expected temperatures be the real temperatures? Will the expected doses be the real doses? Will the materials act as expected? Will the fuel act as expected? Will casks “weep?” Will spent fuel be brittle? Will gases be a problem? There are a lot of unknowns here. How will casks be decontaminated?

Plant after plant is going to use dry cask storage or dual-purpose casks in the next few years. You know that and so does the NRC, so why are we dealing with data from 1975 that is 25 years old? This base study is taunted as “oh, so conservative”, and the new studies as showing everything lower than that old study predicted. Is that supposed to make the public feel secure? I don’t think so. Are you planning to use cask designs from 1975?

A big concern in the MRS study years ago (monitored retrievable storage – remember that plan?) was that you would have to check the spent fuel condition before you could transport it, and they were afraid they would end up having to open any dual-purpose or multi-purpose casks to make sure things were okay in there before any transport could be allowed.

3. So, what is planned? Are these big transport casks to be loaded at the pools with individual assemblies right out of the pool? Will there be dry transfer at the pad from storage casks to transport casks? Will there be canisters of assemblies just put in “storage” over-packs and then in “transport” over-packs without opening the canister to check the fuel? And, will fuel be handled in many areas from truck casks to rail casks? How will this be done? All these modes of handling need to be figured out, and evaluation of all this handling on pellets, cladding, and canister materials and seals needs to be evaluated. That is what “package performance” is all about. We need to know the package. We need to know how it will be handled. Then we can look at performance.
4. New cask designs may meet NRC certification requirements; however, generic storage and transport requirements are in their infancy for all these new designs up for certification. There are changes made constantly by vendors and licensees in storage casks, so I suppose the same will happen with dual-purpose casks – to meet each utilities site specific needs. This lack of standardization will cause problems. Vendors are new, fabricators are new, and contractors and subcontractors are making these designs for the first time. Mistakes will be

made in fabrication and in handling. This isn't a perfect world. A lot of this is new, cutting-edge technology – not so simple as once thought. NRC knows that.

5. Where are the weak points in transport cask designs? Where are doses the highest? When will temperatures be the highest? Are sideways impacts really considered in these new designs? Can they rotate on impact? What materials interactions in new cask designs will there be in a fire? *Say a plane crash, with the plane's fuel on fire? (Into a truck cask or rail cask going at high speed?) Are we just to ignore such a possibility because NEI requests we don't look at – what – “extreme” cases?
6. Computer models need to be done for behavior of spent fuel assemblies, as well as for sub-systems – bolts can be of utmost importance. (If the “little things” go, we are in big trouble sometimes.) If the basket itself, in a transport of a dual-purpose cask, doesn't hold up, we are in trouble. Degradation of material properties can't be done by a “literature review.” We need to test the real thing – long term. We need to open those casks at Surrey and see what's been going on in there. Even then, they are only a few of the designs used and loaded – what – maybe 10 or 15 years at the most??
7. If casks are to be used repeatedly for all these trips planned, certainly some criteria has to be set and predicted as to how long a cask will hold up without problems. How would the cask be checked after each trip? What problems could there be? How resolved? Certainly, there is some sort of “wear and tear” expected? Decontamination?
8. The Trupact cask was referenced. Is that the one in which welds and walls were ground down too far, and the casks couldn't be used, but DOE had to buy them anyway to keep the vendor in business to make new casks? There was a GAO report on that, wasn't there? What a mess! A lot of the vendors are small new businesses, being bought out by bigger companies. In competition, costs are cut by cheaper materials being used, etc. Is the cheapest cask bought by utilities or DOE really in the public interest for health and safety? I think not.
9. Gas release needs more study. Materials interactions over time in storage and in transport need to be fully understood. If there is hydrogen, there can be an explosion. We found that out in Wisconsin with the rsc-24 cask at Pt. Black. Will hydrogen be vented properly in unloading a storage cask to put the assemblies into a transport cask? Will they be unloaded to the pool first, then taken out again? How is this all going to work? Surely what happens at poolside, and on cask pads, affects what happens in transport.
10. Seals are of main concern. O-rings and welds with “acceptable” flaws, already there, may not hold over time in transport – especially after long-term storage of a canister.
11. How is sabotage evaluated for transport? Certainly, new weapons need to be analyzed as to damage they can do to a truck, or rail, or barge cask. And considering a lot of this waste will be traveling by the Nevada Test Site, what is to happen there in the future that could affect casks in transport? *Are there a lot of planes flying over routes?

12. Are trains and trucks to travel at night with the waste? How are rail crossings marked? We have had trucks hit trains at crossings in Wisconsin.
13. High burn-up fuels to be used makes cladding more brittle, and new cask designs apparently are for these high burn-ups. What can happen?
14. Studies of thermal burst rupture in rod failure and fracturing of embrittled rods is important.
15. NRC should broaden the scope of the study to include more on barges, as we could have them on Lake Michigan or the Mississippi River in our area.
16. Loading and unloading need to be part of the study.
17. Intermodal transfers need more detail and evaluation. What is the actual plan, in detail, here?
18. I don't see why the effect of emergency response to accidents, and to population doses, is not in the scope of this study. It is a big public concern and certainly related here.
19. Cask drops are of utmost concern. For example, the VSC-24 canister was "hoped" to be eventually used for storage and transport. As more and more surprises were revealed, that hope has now all but disappeared for casks already loaded, as I understand it. A lot of the dual-purpose designs have only gotten through the storage certification so far. If plants load them before careful certification for transport is done, these casks may end up being storage-only. There are unknowns. All changes to the design need to keep that cask drop incident in mind. Seal welds and baskets are especially of concern here.
20. What do you mean in intermodal transfer (p. 48) the fall height would "almost always" be less than 10 meters and the impact would "almost certainly" be onto an unyielding surface?
21. Have you ever gone on a trip, maybe with your family in the car, say during the Christmas holidays? You are driving at night, and it starts to sleet and you have to go around, say Chicago, and you get held up in a traffic jam because of an accident up ahead, or some construction, or a snowplow – whatever. You slide off the road. You get "rear ended." -- Why, certainly common sense dictates that weather, time of day, road conditions, time of year, amount of traffic, etc., all affect transportation. -- Or weather is hot and dry, the train goes through a lot of areas where grass and fields are perfect for ignition – a fire starts in a place where the train is stopped. We had several fires along a railway in a town nearby just last year. We just had a hailstorm this spring that broke car windshields, wrecked roofs, pitted siding and broke a lot of people's house windows all on one side. I couldn't believe it! Our prairie was pitted with holes in the ground – big ones – like baseballs! Trees were shedded of leaves. We have had more and more of these "freak" hailstorms the past few years in Wisconsin, and more and more lightning. A lot of people think all the pollution in the air is having an effect., Is global warming an issue? We had a storm with hurricane level winds that twisted trees like corkscrews. We have had more frequent tornadoes. (A lot of people have said that they used to love watching a storm, but are now truly afraid of

them.) Man is affecting nature in the weather as well as everything else. Certainly accident rates are dependent on weather conditions in correlation with population densities, time of day, time of week and year; it's only common sense. We all know that. This needs to be part of your study.

22. What will be the criteria for a shipment not going on time? I know this whole waste system is so "schedule driven" by the nuclear industry, that trucks and trains with casks will be sent out if at all possible. What kind of weather prediction would halt a shipment from starting? What conditions would stop it on its way? When is a driver to "make the call" himself and stop? Where can he stop? How long? These details need thought.
23. And, you can say what you want about this being just about the package, but this package is part of a system and really cannot be evaluated properly if not within the system. Important parts of the system are the truck and train. What are criteria for them? How impacted? For what? When? How decontaminated, if necessary? These need to be in tip-top shape, tires, train rails inspected regularly, roads inspected regularly. Who is looking at all this, DOT? How are NRC, DOE, and DOT working together on this as a whole?
24. And, the most important part of this system, in the end, will be the driving crew. We all know that. Just what tests will these drivers have to pass? Will you look at their health history and background? Will they be rechecked over a time period? Will their record of safety on the job be more important than speed and getting the shipment through "no matter what?" I really think about these drives a lot. Human error, all through the waste system, from cask fabricator worker to truck driving crew, may actually be the biggest cause of accidents. Spent fuel is a scary thing. It makes people nervous. You have a driver already "jittery" and he has problems on the road – then what?? There was a reference someplace in the study that in the 1975 data, drivers stopped, but in the new study driving "crews" wouldn't. (Yes, p. 21 of NRC Study.) It says "today crews typically drive continuously from origin to destination." For a 2000-mile trip, this greatly reduced the number of stops and reduced stop impacts by about a factor of 10. In 1977 they stopped to sleep every 200 miles, it says. But they don't do that any more. This is supposed to be safer?? Well, surely I understand that one of the crew sleeps while the other drives. Is a "crew" just two people, or more? Have you ever tried to make stops a minimum on a trip? Have you ever stayed enclosed in a truck or vehicle for 2000 miles? Would you want to? Over and over and over again – with dangerous spent fuel behind you, if you are sleeping and driving in the truck? Seems to me we want drivers in the best of condition for these dangerous cargoes, not the worst. They need to get out of there more often!!! This is really a big concern to me, and a minor detail to evaluation, I expect. It should be major.

A real close scrutiny should be done about everything that can affect that driving crew. The package performance, after all is said and done, will depend on what that crew does in transporting it. Let's consider for a moment what could occur. Let's brainstorm a bit: Well, -- cell phones are causing all sorts of accidents. Are drivers ever allowed to talk on the phone while driving? Are drivers going to be ever talking to escorts some way, or to emergency help, etc., or is "crew" to do that? Where is the crew? Asleep in the back?

Are drivers allowed to eat or drink while driving? Can they smoke?

If a driver gets sick, must the truck stop and wait for a relief driver to come, or can the other crew member do "double duty?" How would anybody know? How are drivers' records kept and inspected?

Is there a bathroom on the truck? Certainly frequent stops at waysides or gas stations will have to be made.

Where can trains and trucks stop? How long?

How is radiation dose to crew of trains and trucks known? Is this just evaluated by computers, or will they wear dosimeters, or what? How are casks to be checked for leakage or "weeping" en route? And, if there is a problem, do they stop or keep going? Is there a check at the beginning and end of the trip and no check in between?? That puts the public at risk, doesn't it? And, if people are irradiated along a certain stretch of road or rail, how will they be notified? Or, will it be kept secret? People haven't forgotten "down-winders."

The "crew" itself, and how they behave, will affect the public. If a driver is drunk, we have a problem. If a driver was up all night with a new baby, we have a problem. Well – you know the concerns. This needs a lot of creative thought and protective measure put in place.

25. This average dose to the public is really just unacceptable to most people. As a lot of people in Nevada have testified – they have no choice. This risk is dumped on them. Those people will take the brunt of the most shipments in their backyard. I'm thinking about a lot of scenarios here.

A. You take your small child to day care every day on the way to work. Your route follows that of radioactive shipments. What is the dose to your child?

B. You are pregnant. You are a dental technician and sometimes are not as careful giving x-rays. You have a high rate of radon at your house. You fly to Denver to visit your folks often. You have had to have a lot of x-rays in the past for some broken bone that didn't heal right, etc., etc. – in other words – your cumulative dose is a lot higher than background. Where are the studies that show exactly what additional dose can't cause your future baby a problem? What if you park next to a truck shipment at the wayside and take a nap in your car? What if you drive behind or alongside a shipment for many miles? Say you are both caught in a traffic jam?

C. You live in an apartment on a corner of a busy street where there is a stoplight. You leave your window open on the second floor in the room where you work at your computer all day. That window is about level with the top of the cask on a truck that stops at that light every day. What is the dose to you? **Where are the highest dose levels from casks on trucks and trains? On the sides? Above them? Where? We need to know this.

- D. Your house is right alongside the track where a train stops, full of casks, every day. You are disabled. You have had many, many x-rays in your life. You drove tanks with DU in them during the war. What is your total lifetime cumulative dose?

Well, of course, what I'm getting at is that 100 millirem-per-year allowable dose standard for individuals, or the 25 millirem-per-year standard used for long term population exposures becomes meaningless when you don't know the condition of the individual or the population before this dose was added to what they were already exposed to in their lives.

NRC says (p. 23) "average doses to individuals are virtually undetectable." Is that comforting to a pregnant mother with a small child near any nuclear waste shipment? I think not.

26. The modal study analysis used a "generic" truck and a "generic" rail cask. We want to know the details of this cask and how it relates to real cask designs now in the certification process. What are the differences??

Why weren't cask seal area temperatures directly calculated? How were they "inferred?" From what "cask design details?" Why were fuel rod temperatures not estimated? How was rod failure by burst rupture looked at? How is H. B. Robinson spent fuel representative of spent fuel that is really going on our roads and rails? What are the differences? (p. 55)

27. (p. 56) These four "generic" casks studied for NMREG/CR-6672 need more description and comparison to real casks to be used. You say two were steel-lead-steel truck and rail casks, another was a steel-DU-steel truck cask, and another was a "monolithic" steel rail cask. Where did these designs come from? How current are they to represent the real thing? When "square shapes" represent lid bolts, I worry! So often computer analysis is changed so much by "simplified" (supposedly conservative, but sometimes really not) versions to get the data "computer usable" in the model. This concerns the public.
28. Particles and vapors, impacts of fracturing (maybe already fractured before loaded) pellets, and CRUD are of real concern. The failure of seals needs a lot of testing and evaluation.
29. Page 57 - Whoa! This really sticks out! The second to last paragraph there. "Because very little experimental data exists on which to base estimates of rod failure fractions, impact fracturing of fuel pellets and CRUD, particle bed formation, and bed filtering, both the MODAL Study and the Sandia Study were forced to use expert judgement and hand calculations to estimate release fractions for particles from failed fuel rods to the cask interior upon rod failure due to impact or burst rupture. A lot of work needs to be done here!! What studies are planned? Long-term??
30. Coatings and paint. Any place anything has a coating, or is painted, needs your attention for materials interactions, new materials created by these interactions and their interactions, degradation of coatings and paint, and inspection of them, and repair of them, and inspection of repairs. Manufacturers specifications for application and use need to be followed. This

has caused big problems in dry cask storage. Let's not let it happen again in transport. Look into this.

31. Temperatures for cask movement are concern also. After, say, 40 years of dry storage at a plant, or at an interim site, can this fuel become so embrittled that any jolt on a rail or road trip will cause problems? How would you know? Right now we have casks loaded in storage at our local Pt. Beach plant that can't be moved unless the temperature is 35°. The VSC-24 was designed to be moved at 0°, but because of flaws in structural lid seal welds, the temperature had to be raised. Then also, some cask materials for loaded casks at Palisades, and I think one at Pt. Beach also, were not charpy tested as supposed to be, and those have temperature movement concerns beyond the weld flaws. Also, there are undocumented welds that the fabricator didn't think necessary to document. A bar was attached in molding the shell wall, as I understand it, and then removed. Poor fit of lids can cause seal problems and weld cracks. Poor materials can cover HIC as I understand it. Gases do cause problems. There are a lot of "lessons learned" so far. Coatings, painted on, flake off in pool water. If they are baked on, it needs to be done according to specifications. Carbon steel reacts with boron in pool water. Zinc coatings create hydrogen. What else don't we know yet? A lot of this is new. There will be surprises. And remember – "spent fuel has a memory." Marvin Resnikoff said that at a hearing in Wisconsin, and it really made me think. It's a very good analysis, I feel.
32. Rigid barriers and impacts of hitting them are a concern. We have a new expressway around Appleton. A good section of it has a continuous concrete wall along it to keep the sound from the residential areas behind the wall. It's close to the highway for a long ways. Isn't this a hazard? How much of such stuff is on cask transport routes?
33. How will spent fuel and high level radioactive waste shipments be marked so the public CLEARLY understands, in any language, what is in there. If a truck is parked at a wayside and your kid's frisbee lands next to it, or on top of it, will he know that the closer he gets, the more radiation he gets? Will you know? If you don't want to keep driving, with your small baby, behind a cask shipment, will you even know (from the back) that you are being irradiated? And your child is. (Or your fetus?) Additional radiation to background is specific to the individual – to the health, age, previous radiation accumulated, etc. etc. I worry about this. I worry about people in Nevada especially. And, I worry about the truck and train crews. Are they properly trained to know how to be careful about doses they receive in how they do things – where doses are the greatest for example.
34. Las Vegas – Well, what does that city bring up in your imagination? I see gambling, drinking, partying – oh, I'm sure there are a lot of nice people there – but, I would imagine there are a lot of hazardous people driving there just because of what people go there for. Is this being carefully evaluated? And, what is this "spaghetti bowl" of highways that I see referred too? What are highway conditions there and plans for the future?
35. How are truck trailers attached to the cabs? One got detached going downhill near Chicago in some report I read long ago – it had radioactive waste on it – just stopped by itself if I remember right. Are you familiar with that event? Well – the couplings on trucks and

trains are of real importance – they could make all the difference. How are they inspected? How often checked? How vulnerable to sabotage? That was the old trick in lots of movies – (uncouple the cars and get the money or whatever – guys – cowboys always walking on top of railway cars at high speed and coming to a tunnel! Well, is this possible in real life with rail casks??)

36. P. 4 of NRC Study says there were 8 accidents with shipments of spent fuel between 1971 and 1995. Is this correct? What constitutes an “accident?” How is that defined here? How many reports are there of other, shall we say, “mishaps” or whatever? It says there were no non-routine doses due to release of radioactive material. However, that isn’t clear; where are the evaluations of doses that were not due to releases? Is that a case? Were there doses from cask “weeping”? Were there doses from problems unloading casks full of BWR fuel that shedded crud to the bottom of the cask? I think the public deserves a complete evaluation and truthful history of all transport problems of the past. Keep it honest if you want to gain any public trust in the future. All the concerns need to be “aired” now. The public wants to help in keeping spent fuel as safe as possible. After all, our health is of concern. What did happen in those 8 accidents? I, for one, would like a full account in the next study.
37. Older fuel isn’t necessarily safer because it is less radioactive and cooler temperature-wise. Especially when you load a lot more of it into transport casks than you ever did before. Older fuel is just that – aged – degraded possibly – brittle – cracked. Older is not really always an advantage.
38. NRC Report (p. 5) ways “Studies indicate that added doses up to a tenth of background (10 to 40 millirem) have no discernable effect on human health.” Wow, that is a loaded statement and sure to create controversy. Added to what? We already live near nuclear plants and have added radiation from them, as well as dry casks stored near them. People in Nevada live near test sites too. Etc. Etc. Background radiation of what? Where? (In Denver?) In my basement with radon? Lots of unknowns here.
39. NRC says (p. 5) The year 2000 risk study confirms that earlier estimates of risk to the public are unlikely to be exceeded in the “foreseeable” future. What is the “foreseeable” future at this point when we don’t ever have dual purpose designs “of the future” in use? This isn’t very comforting to the public.
40. NRC Report (p. 9) “Regulations limit radiation levels to a dose rate of 10 millirem/hour at a distance of 6.5 feet from the edge of the truck bed or railcar to which a cask is attached.” This needs more clarity to the public – in what are other doses and where in relation to the public? Where is the highest dose on a transport cask? What is the dose rate at different locations on the cask? Side, front, back, above, etc. Dose rates, different for different cask designs?? For different loads?? The public is going to want to know this. So are the drivers and rest of crew. This must be public information, and truthful, for any trust here.
41. A lot of people have already had cancer – been exposed to a lot of radiation already? How much added dosage will cause more trouble to their health?

42. The tremendous weight of new cask designs needs very careful evaluation for travel paths, loading and unloading procedures. Roads and rails need to be in condition to carry these heavy loads and emergency equipment needs to be available to deal with accidents with these heavy loads, and emergency crew well-versed in radiation hazards. If they aren't, they put the public at risk and "package performance" at risk too.
43. The total effect of spent fuel movement in any handling needs to be evaluated. The cladding is only going to take so much "banging around" in that basket. How tight does the rod fit in the assembly? How tight does the assembly fit in the basket sleeve? (There are coatings in there, remember) How tight is the basket in the canister? How tight is the canister in transport overpack? Anything that can move in that cask during 200 miles of transport, (barge, truck, rail – unloading – loading) will be jostled about. Certain points of stress will be rubbed, or jolted, or slid against repeatedly. Roads and rails and lakes and rivers are not smooth rides a great deal of the time. Up steep hills and down. The position of those pellets and rods, and everything else, in that cask will be important? How will everything "sit" in that basket when gravity pulls it to one side – the bottom side nearest the truck bed. Try to visualize just how the fuel and basket is arranged in there, as if you could see in there with an x-ray. What is bumping what – what areas are repeatedly being hit together over and over again? Will the basket sag or slump? Will the rods bow? Does anybody really know? Will crud and coatings flake off, fall to the bottom (really "the side" as it is horizontal, and then fall down that side as the cask is righted to the vertical position again?) A lot of this spent fuel will be stored a long time before it is put in transport casks, and handled a lot too. Position may be very important.
44. NRC Report (p. 10) It says "After the tests, the external dose rate may not increase to more than 1 rem/hr at 3.3 ft. from the cask surface." Where?? What is the location? Anyplace 3.3 feet from the cask? Top, bottom, ends? It says, "the gas leak rate must be below the test required to demonstrate sealing of food cans". What?? Please explain this clearly. The inertia here comes from what analysis? How did we get to these 2 requirements? Why?? Seems strange!
45. Frankly I have little faith in QA of vendors and licensees and NRC enforcement and inspection. The fiasco of blunder after blunder in QA of the VSC-24 fabrication over the years has really made the public aware of problems. We have VSC-24 casks loaded at Pt. Beach here in Wisconsin. One had an explosion when hydrogen lifted up that huge shield lid and set it cockeyed. Then we were told hydrogen could be safely vented and all was fine – soon after this we have not one, but two hydrogen "burns" I loading VSC-24 casks at Palisades. They were venting hydrogen with too short a plastic tube, a tube that was flammable, and fastened with – what else – but DUCT TAPE! So much for that!! If anything shattered public confidence in their solution to the hydrogen – that did! Then we have the mess with the transfer coating at Trojan. They apparently painted on parts of the coating and I don't think even the baked on parts of the coating were done right either – result? – pool reaction with carbon steel and paint coming off – can't even see well enough to load! Great QA! And when Nuhoms casks had welds and walls ground down to low levels, that was another problem. And, of course, when you have to develop an NT test for already loaded VSC-24s at Palisades, and "analyze out" flaws for almost 9 months to find

them “acceptable” in the seal weld – well – you know you have a problem situation. Enough said about all that.

46. NRC Report (p. 11) It says there that out of 3 to 4 million radioactive material packages shipped per year “a few hundred of them are spent fuel or similarly packaged.” Yet on (p. 4) it says “During the mid 1980s, highway and rail shipments totaled less than 200 per year. At present, they are less than 20 per year.” So which is it – are we shipping a few hundred as the first statement implies, or 20 as the second statement says? It does make a difference. Just how many transport casks have been shipped each year for the past 20 years? How far? Which casks? How many incidents? How many accidents?
47. It is clear on p. 12 of NRC Study “there are radiological consequences (doses) because the cask emits radiation continuously” – “at a low rate”. What is this rate? At what locations? It says “thus accident-free risk is simply the total of all doses received by all exposed persons expressed in person – rem.” I beg to differ here. It is this total added to all the doses these persons have already received so far in their lives – and that total is recorded nowhere. We don’t go around with a pad and pen keeping record of whenever we are irradiated and what doses we receive – we have no way of knowing. This is the problem – and a big concern. Considering we already have background radiation, and that from bomb tests, everything else is additional already to that load our bodies already carry. I think of my daughter in law – from Harrisburg (-- yes – and there during Three Mile Island event.) Then she was overseas at the time of Chernoble and the radiation cloud went over. I was worried about it when my new grandson was born. Maybe unnecessarily so – but there are a lot of unknowns here.
48. I found pages 14 and 15 of the NRC Study of most interest and think the public wants to know more information like this and how it is arrived at. I really find the illustrative highway route for the 840,000 people (p. 15) with the dose average to .0001 millirem, in a mile wide strip around the route, not really very valid of the real situation. Averages like this don’t tell us what happens to the one year old child living by the highway where the trucks stop. They don’t tell us the real situation.
49. Hills are important and how loads are fastened to the truck or rail car. I have had three near accidents behind truck loads in my life – all on hills. One was when a bunch of ladders came unfastened off the roof of a workers truck. The other was when fasteners came loose and a whole load of wooden crate like things (forklifts use them to lift loads on) flew off all over the highway – they were big heavy things. The third was when a huge truck in front of me hit a bump going up a hill – I think he was going too fast too -- There was a big piece of equipment on the flatbed and a huge wooden plank under one end to brace it up, bounced out from under fastener came loose, and it came flying out toward my car. I was lucky on all occasions. No accidents – but hills and fastened on casks remind me of what can happen in this situation if things aren’t fabricated right or inspected right for those fasteners holding the cask on the truck or rail car. They are of utmost importance and need a lot of careful evaluation for “wear and tear” over time, brittleness in freezing weather – cracking, etc. What is certain here for fabrication, inspections, etc.? What are the materials in these fastening devices?

50. The last page of the NRC Study talks about risks, and benefits from taking risks, as if we should be happy if this is successful and it enables continued production of electricity. They don't mention it also allows continued production of MORE spent fuel. Is that a "goal"? I'd say Sandia should spend more time working on renewable energy. I really think the spent fuel is safer at the plants, and not traveling on our roads and rails, and not be buried underground in Nevada. It should remain above ground where it is in casks accessible for repairs and casks that can be monitored – where unloading and retrieval can be done. The retrieval plan for Yucca Mt. Is pretty vague and to haul out all those drip shields, and dig out rock falls, and use robots, and maybe have gantry problems – etc. looks like a recipe for big underground problems in getting any problem cask out of there. And I would think there would be some problem casks.

Please put my name and address on your mailing list and send the response to comments and future studies on these issues. I do not use a computer, so I'd really appreciate being informed with paper copies of anything you can send.

Thank you for your concern for these comments,

Fawn Shillinglaw

(cc. Public Citizen)

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R. Lewis, NRC Project Manager

11. ABSTRACT (200 words or less)

This report presents the results of the scoping phase of the Package Performance Study which Sandia National Laboratories (SNL) is performing for the U.S. Nuclear Regulatory Commission (NRC). The report presents SNL's assessment of the research that could be undertaken to address stakeholder concerns about the safety performance of spent fuel and spent fuel packages during the unlikely but severe transportation accidents and thereby increase public confidence in the safety of spent fuel shipments. The Package Performance Study will reexamine the level of protection provided by NRC certified spent fuel transportation package designs under severe accident conditions. The study will update the methods and results of a 1987 study of package performance under severe accident conditions, commonly referred to as the Modal Study (NUREG/CR-4829), and the extensions of those methods used in a recently completed study (NUREG/CR-6672), which estimated the risks of transporting spent fuel by truck and rail.

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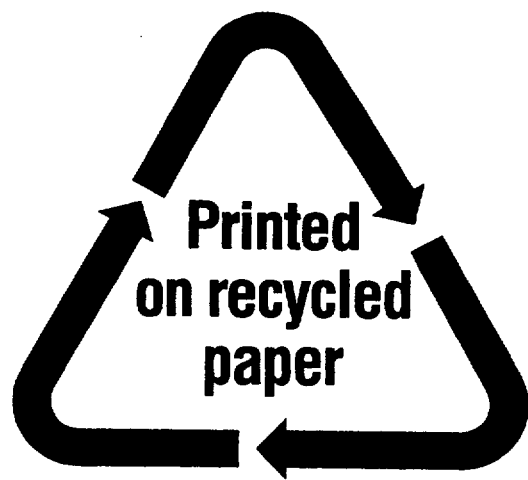
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