

Full-Scale Testing of Shipping Casks

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Background Issues

Transportation System Uncertainties

- Yucca Mountain site may not have rail access by 2010, by 2016, or ever; 24 existing reactor sites could have difficulty shipping by rail
- Under the DOE Mostly Rail Scenario there could be 10,725 Cask-Shipments over 24 years (about 8 rail casks per week, shipped in 2-8 trains, plus about 1 truck cask per week; additionally there would be 2,000 + barge and/or heavy haul truck shipments from 24 reactors to rail connections)
- Under the DOE Mostly Truck Scenario there could be 53,086 Cask-Shipments over 24 years (about 6 trucks per day, plus 300 rail casks of naval SNF shipped from Idaho in 100-300 trains)
- Even if rail access is constructed, DOE could ship for up to six years using only legal weight truck (LWT) casks, either by truck or by rail
- Utilities standard contract options could result in shipment of 5-year cooled spent fuel by truck and/or by rail

Background Issues

Transportation System Hazards

- Direct SNF exposure deadly for 50+ years
- Each cask contains enormous amount of dangerous radioactive materials (180,000 to 800,000 curies of radio-cesium)
- Routine radiation from casks hazardous to workers and to some members of public
- Cask breach in worst-case accident: 5-4,000+ latent cancer fatalities (LCFs) and \$300,000-10 billion+ cleanup costs
- Cask breach in successful terrorist attack: 48-1,800+ LCFs and \$10 billion+ cleanup costs

Cask Testing: Current Situation

- NRC does not require physical testing
- 16 shipping cask designs currently certified
- No currently certified US cask has been tested full-scale to demonstrate compliance with 10CFR71(drop, puncture, fire, immersion)
- 2 truck cask designs drop-tested using half-scale models (TN-8 & GA-4)
- 3 rail cask designs drop-tested using 1/3- or 1/4-scale models (125-B, NAC-STC, TN-68)
- Scale-model impact limiter tests (9 casks)

Nevada Recommendations

Full-Scale Physical Testing of Casks

- Meaningful stakeholder role in development of testing protocols & selection of test facilities and personnel
- Full-scale physical testing (sequential drop, puncture, fire, and immersion) prior to NRC certification
- Additional testing (casks, components, models) and computer simulations to determine performance in extra-regulatory accidents and to determine failure thresholds
- Reevaluate Modal Study findings , and if appropriate, revise NRC cask performance standards
- Evaluate costs and benefits of destructive testing of a randomly-selected production model cask

Estimated Cost of Nevada Proposal for Regulatory Testing (2003 Dollars)

- Legal-Weight Truck Cask: \$7.8-8.4 Million
- First Rail Cask (130 ton): \$19.1-22.0 Million
- Subsequent Rail Cask: \$9.1-12.0 Million
- Assume one-time cost of \$10 Million to upgrade test facility to lift and drop 130 ton cask

Overall Cost of Nevada Proposal (2003 Dollars)

- Estimated Cost of regulatory testing for 4 rail casks and 1 truck cask, plus testing to failure program that includes full-scale fire test of 1 truck cask: \$50-70 Million
- Estimated Cost of Yucca Mountain transportation system (38 Years): \$7.5-9.5 Billion

High-Priority Cask Testing Issues to be Addressed in NRC PPS

- Extent of stakeholder participation
- Selection of cask testing facilities
- Selection of casks to be tested
- Selection of test scenarios
- Availability of funding
- Commitment to testing program

Nevada Perspective on Controversy Over Baltimore Fire Studies

- Nevada publishes report on Baltimore Fire September 2001
- Nevada raises Baltimore Fire issues relative to NRC PPS full-scale testing proposal May 2002-Present
- NRC excludes Nevada consultants from technical meetings with NRC contractors (NIST) June-August, 2002
- NRC withholds draft reports and technical analyses requested by Nevada under FOIA August 2002-April 2003
- Baltimore Fire discussed at WM'03 Conference February 2003
- Baltimore Fire discussed at NRC PPS meetings March 2003
- NRC invites Nevada consultants to meet with NRC staff and contractors, provides requested data, and initiates open and ongoing dialogue April 2003-Present
- NRC Inspector General investigation May 2003-Present

Nevada Perspective on Baltimore Fire Study Issues to be Resolved

- NIST fire model & tunnel experiments
- Significance of water main break and oxygen supply
- Fire history reconstruction (duration, temperatures, cool down period)
- Hypothetical accident conditions (e.g., cask lid proximity to hottest region of fire)
- Selection of cask(s) to be evaluated and significance of welded internal canister
- Cask and fuel performance modeling
- Implications for extra-regulatory cask testing
- Need for independent peer review

Nevada Comments on NUREG-1768

NRC PPS Draft Test Protocols

- Good stakeholder participation process through March, 2003: public meetings, transcripts, website
- The draft testing protocols are wholly unacceptable
- NRC must reissue new draft for public comment
- NRC program costs >\$20 million but would not determine if two casks tested meet NRC accident performance standards
- NRC program costs >\$20 million but would not determine failure thresholds of the two casks tested
- NRC program results would not validate models
 - Impact test: expected cask deformations too small to be accurately measured
 - Fire test: unclear fire duration

Nevada Recommendations to NRC

Extra-regulatory Full-Scale Tests

- Test Casks to be used for Yucca Mountain Shipments (Truck-GA/4; Rail-TBD)
- Load Casks with one PWR assembly, plus dummy or surrogate assemblies and heaters (simulate 5 YR SNF)
- Rail Impact Test: Tower drop; Lid end, Center of gravity over corner impact; No impact limiter; Speed TBD, based on modeling failure (probably >75 mph)
- Truck Impact Test: Tower drop; Lid end or backbreaker, TBD; No impact limiter; Speed TBD, based on modeling failure (probably >75 mph)
- Fire Test: Engulfing fire, Minimum 3 hours @ 1800°F (1000°C) or 6 hours @ 1475°F (800°C)

Nevada Critique of SECY-04-0135, July 2004

Test Purpose

- NRC program costs up to \$40 million but would not determine if cask(s) tested meet NRC accident performance standards per 10CFR71
- NRC program costs up to \$40 million but would not determine failure thresholds of the cask(s) tested
- NRC program costs up to \$40 but may not provide any significant data for validation of existing computer models or scaling assumptions
- NRC objective appears to be primarily public relations

Nevada Critique of SECY-04-0135, July 2004

Test Details

- No plan to test a truck cask
- No current basis for selection of “representative” rail cask
- No provision for meaningful stakeholder input regarding test design, cask selection, & test facility selection
- No commitment to independent peer review

Nevada Critique of SECY-04-0135, July 2004

Stakeholder and Public Confidence

Nevada Critique of SECY-04-0135, July 2004

Stakeholder and Public Confidence

- NRC acknowledges lack of stakeholder confidence
- NRC staff and contractors initially propose “extreme” testing concepts and invite stakeholder comment
- Key stakeholders provide detailed recommendations and applaud NRC commitment to participation process
- NRC rejects major stakeholder recommendations, retreats from original NRC staff and contractor testing proposals, and limits future stakeholder involvement
- Likely result: Further erosion of stakeholder and public confidence in NRC