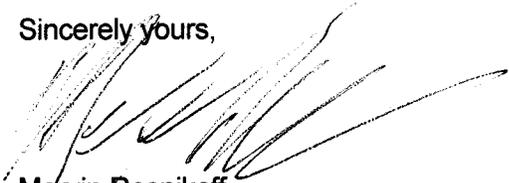


One additional aspect of a potential accident involving a fire must be considered. It is generally assumed by cask manufacturers that the neutron-absorbing liquid is lost in an accident, and the 5 inch torus contains air, which essentially acts as an insulator, shielding the cask contents from the external fire. If an accident involves a truck hitting a bridge abutment sideways, as an example, the impact absorbers at the ends of the cask will not be effective. The neutron shield will then be bent inwards, greatly reducing the 5 inch air insulation, and may provide a conduction path for the subsequent fire.

We would like a response from the NRC on the two issues raised. 1) Does NAC's calculations take into account the conduction path of the radial steel bars? Has the NRC taken these steel bars into account in its review? 2) Has NAC and the NRC examined a sideways impact and subsequent fire in your thermal analysis?

Thank you for your response.

Sincerely yours,



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