

On Dec 14 a meeting was held of the RCC Risk and Lethality Commonality Team (RALCT). This team is in the process of further defining commonly accepted methods for calculating risks. Therefore an agenda item was the review of several recent publications from DOT concerning risk-based methods.

This email is in response to an action item at the meeting and recognizes the short suspense of an 18 Dec closing date for one of the publications.

The following page provides comments on FAA-1999-5833-15, paragraph 420.65 on "Handling of solid propellants." These comments are applicable to licensing the launch site.

If you desire a more detailed review of information supporting these comments, or expanded comments on the entire FAA-1999-5833-15 document please advise. If you or your staff would like a briefing of the contents we will arrange one.

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Comments on Paragraph 420.65 of FAA-99-5833-15:

General Comment: Provisions for 1.2 classified rocket motors need to be considered. UN criteria may be pushing many 1.3 rocket motors to a 1.2 classification in the future.

Paragraph 420.65b: In addition to adding the 1.3 and 1.1 material together or adding the TNT equivalent weight of the 1.3 material and the 1.1 material, there is another option of adding the percent contribution of the 1.3 material to a detonation of the 1.1 material that needs to be provided. This option can only be used if supported by full scale testing.

Table E-1:

1. For quantities greater than 1,000,000 lbs. The formula $D=5W^{1/3}$ is in the wrong column. The formula should be under, "intraline distance (ft) for division 1.3". It is currently in the column titled, "intraline distance (ft) for division 1.1". The formula $D=18W^{1/3}$ is correct for intraline distance (ft) for division 1.1.
2. A provision to permit a public area distance (ft) for division 1.1 when the NEW is between 0 and 100 lbs. to be 670 ft. for thin-cased explosives should be included. This is appropriate due to the lack of primary fragments, and it is consistent with DOD policy.

Paragraph 420.65d(4): A linear interpolation should only be used for the 1.3 values. For the 1.1 values the generic formula $D=KW^{1/3}$ should be used.