
Transmitted by the representative of Republic of
Korea

Comments to RESS-2-2 Rev. 1 with UN 38.3 from 17.01.2011

On 'proposal how to structure the RESS safety requirements'

RESS, at its 2nd informal in Jan 2011, the proposal was presented, thanks to the collaboration of several members.

Korea would like to submit some comments to the proposal, based on our experiences in the past several years.

A. Comments on the following proposal:

§3. 4 Mechanical Impacts

The proposal suggests that the RESS be subject to pre-described acceleration

If this test is carried out, the RESS shall be on the sled. In that case, it is not know what will happen to the RESS. Of course, the manufacture may know what will happen based on his experience. However, there is a slim chance of fire or explosion. Thus it may be dangerous to carry out this sled test in the confined area.

A drop test in an open space, equivalent to the pre-describe acceleration, should be considered as an alternative or replacement.

B. Comments on the following proposal:

§ Additional Requirement: Immersion Test

In the past decade, we witnessed many floods around the world. The **Hurricane Katrina** in 2005 has left huge flood damage to the southern part of USA. The Queensland in Australia also was flooded as recently as January this year. The centre of Seoul, Korea, was flooded to the waist deep in Sep, 2010.

An immersion test should be included. The sea water, as fluid, may be appropriate. The electrical safety as well as chemical safety (for example, toxicity) should be secured.

C. Additional term to the definition:

In some case of RESS, the tests proposed in the proposal may be hard to carry out due to the dimensions of a RESS. If the RESS is installed in a regular bus, the RESS may be too big to handle in the test lab.

A new term represents the typical part of the RESS should be considered.