

**From:** Edward Throm *NR*  
**To:** Glenn Kelly, Mark Rubin *NR*  
**Date:** Friday, June 30, 2000 07:02 AM  
**Subject:** Public Comment #33

DRAFT Response to:

Public comment #33: How did the staff come up with the factor of 100 reduction in the failure rate for heavy load drops for single-failure-proof cranes?

For a non-single-failure proof handling system, the mean probability of a loss-of-inventory was estimated based on NUREG-0612. In NUREG-0612, an alternate fault tree (Figure B-2, page B-16) was used to estimate the probability of exceeding the release guidelines (loss-of-inventory) for a non-single failure proof system. The mean value was estimated to be about  $2.1 \times 10^{-5}$  per year when corrected for the new Navy data and 100 lifts per year. A comparison of this mean value to the  $2.0 \times 10^{-7}$  per year mean value for the single-failure-proof crane shows a factor of 100 reduction.

*3/2/99*