

From: [LANDIS, Raymond](#)
To: [Giantelli, Adelaide](#); [Goldberg, Paul](#)
Cc: [KLINE, Dave](#)
Subject: Additional Large Equipment Example
Date: Thursday, January 16, 2014 10:58:28 AM
Attachments: [Reactor Shield Plug.tif](#)

Adelaide and Paul,

In response to my request to industry for examples of other "Large Equipment" for consideration in inclusion in your developing EGM, I received from a licensee a request to include "Shield Plugs".

If you are not familiar with these, typically they are used on the refueling floor to cover over the reactor cavity or separate the reactor cavity from the other fuel floor elements like the head or dryer separator pits. They are not source material, but may be activated in the course of their use. They are typically many thousand pounds in weight and look like flat disks, partial disks, pie slices, or large blocks. Typically made of concrete encased within a stainless steel skin. I have attached a drawing from one of the licensees asking for their inclusion. This one is specifically 15 feet in diameter and 3 feet in thickness and weighs in at 115,000 pounds.

I would propose the update to my recommended defining of Large Equipment;

"For the purposes of this Enforcement Guidance Memorandum, "Large Equipment" should be considered to be singular equipment with a weight $\geq 2,000$ Kilograms (4,409.25 Pounds) not containing discrete sources or spent ion exchange resin (e.g., steam generators, steam dryers, turbine rotors, reactor vessel heads, shielding blocks)."

I look forward to discussing all of this at 14:30 this afternoon.

Raymond L Landis
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