

KONECRANES®

Lifting Businesses™

Konecranes Nuclear Equipment & Services
5300 S. Emmer Drive, New Berlin, WI 53151
P 262.364.5700 F 262.364.5701

Date: November 15, 2017

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Cc: Chief, Quality Assurance Vendor Inspection Branch-2, Division of Construction Inspection and Operational Programs, Office of New Reactors.

This letter serves to provide additional support the Konecranes Nuclear Equipment & Services, LLC (KNES) Reply to a Notice of Nonconformance-Additional Information furnished as planned to support final review and closure of Nonconformance 99901451/2017-201-01.

Reference: Inspection Report No. 99901451/2017-201

Enclosures: Customer Acceptance Letter as follows:

1. Customer Acceptance letter: AI 17-14312-01 dated 10/12/2017 with attachments
There are (2) **bracketed** public view copies with proprietary information removed and a proprietary statement added to the final 3 pages that are designated as not for release to public. This is provided based on an email request by Yamir Diaz-Castillo on 11/14/17.

Konecranes Nuclear Equipment & Services, LLC (KNES) is pleased to furnish the enclosed objective evidence as requested by the NRC and feel confident that the review of this information by the NRC will result in the acceptance of our response and ultimate closure of this nonconformance.

Sincerely
Konecranes Nuclear Equipment & services, LLC



Tom McCann
Global Director of Nuclear Quality

TE09
NR0

AI 17-14312-01

**NRC QUESTION FOR POLAR CRANE REPLACEMENT PROJECT ON THE USE OF
NYLATRON® MATERIAL FOR SHEAVES**

This action item addresses the NRC requested information on the use of Nylatron® for the sheaves on the main and auxiliary polar crane hoist. The purchase specification 13-CN-0390 required the replacement components for the polar crane trolley meet the requirements of NRC endorsed NOG-1, *Rules for Construction of Overhead and Gantry Cranes (Top Running Bridge, Multiple Girder)*, NUREG-0554, *Single-Failure-Proof Cranes for Nuclear Power Plants*, and NUREG-0612, *Control of Heavy Loads at Nuclear Power Plants*. Konecranes (KNES) took an exception to the requirements of NOG-1, to address weight restrictions in the purchase specification, by using Nylatron® vs steel for the manufacturing of the sheaves. NOG-1, 2004, Section 5427.1, states that sheaves shall be steel. (See SDOC CN390-A00200, Page 82 of 193 for the description of the exception).

KNES provided APS with a justification for the use of Nylatron®, including a white paper dated August 24, 2017. (See attached vendor memo, Subject: *APS Polar Crane Modification Justification for Using NYLATRON® GSM BLUE Sheaves*).

The Nylatron® sheaves were specifically addressed in the Main and Auxiliary Hoist Reeving calculations (See sections 5.3.5 of both SDOCs CN390-A00181 and 204, respectively) each of which went through formal engineering review, comment, and approval from APS modification engineering, civil design engineering and the architect engineering firm mechanical engineer. The sheave design uses Nylatron® GSM Blue material which is designed specifically for sheave applications to provide significant weight savings on trolleys (approximately 8,000 lbs.) and reduced loading on the wire rope, as described in the aforementioned white paper.

The crane vendor failure modes and effects analysis (See SDOC CN390-A00182, Tables 1 and 3 for the Main and Auxiliary Hoist, respectively) documents that a failure of a sheave will not result in a loss of load. In addition, the supporting sheave pins are designed with greater than a 10:1 safety factor as described in the reeving calculations.

KNES has installed single failure proof cranes at Zion, Peach Bottom, Crystal River, and Waterford that use Nylatron® for the sheave material.

The PVNGS Polar Crane replacement is being performed under design modification work order (DMWO) 3282819. The 10 CFR 50.59 for this modification addresses this NOG-1 exception (See Screening S-16-0014), and references the technical justifications for the Nylatron® material with regard to its load carrying capability, containment environmental effects and post-accident sump performance, e.g., no impacts on sump performance or in-vessel effects (See SDOC CN390-A00239 for the technical evaluation).

This issue was originally identified in *Konecranes Nuclear Equipment & Services LLC's Nuclear Regulatory Commission Inspection Report No. 99901451/2017-201, and Notice of Nonconformance*, dated September 13, 2017 (ADAMS Accession number ML 17235B230). KNES initiated corrective/preventive action report (P/CAR) No. 749 to address this issue. KNES is documenting the results of the extent of condition review for this issue and is determining the effects, if any, on any previously delivered safety-related components.

APS provided a letter (ID number 484-09275) dated October 12, 2017, to the crane vendor through the procurement process, accepting the NOG-1 exception for use of the Nylatron® sheaves material, which will support resolution of the identified nonconformance.

**Stephenson, Carl
J(Z05778)**

Digitally signed by Stephenson, Carl J(Z05778);
DN: cn=Stephenson, Carl J(Z05778)
Reason: I am the author of this document
Date: 2017.10.12 15:12:25 -0700



A subsidiary of Pinnacle West Capital Corporation

Mick Mayfield
Fukushima Project Manager
Engineering Projects
Palo Verde Nuclear Generating
Station

Tel. 623-393-7287
Cell: 815-985-5091
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Mail Station 7904
5801 S. Wintersburg
Tonopah, AZ 85354

Date: October 12, 2017

Project ID # ZC-1311-17363-P
ID #: 484-09275-MM/ac

Koncranes Lifting Businesses
Nuclear Equipement & Services
5300 Emmer Drive
New Berlin, WI 53151

Attention: Jay Edmundson

Subject: APS PVGS Acceptance of the use of Nylatron for Sheaves on the Replacement Trolley Assemblies
Attachments: CR 17-14312

Jay:

DMWO 3282819 for the replacement of the polar crane trolley assemblies and additional components necessary to meet NOG-1 Compliance for a Single Failure Proof Crane has reviewed Konecranes exception to the NOG-1 compliance and find the use of Nylatron acceptable. The review process included the original exception to NOG-1 with document 36676-22 Rev 0 which prompted APS to request a white paper describing the thought process of KNES for the request of alternative materials. KNES provide a white paper dated August 24, 2017 that provide material properties, methodology, and OE that formed the basis for APS to have this addressed in the appropriate calculations and project documents. All associated documents then went the normal project evaluation process for approval and incorporation into the engineering design modification work order.

With all documents associated with the use of Nylatron and the DMWO Package approved for installation, the exception to NOG-1 for the use of Nylatron is formally accepted by APS for use in the replacement trolleys for all three units.

Regards,

Mayfield,
X Mickey (ZB8637)

Digitally signed by Mayfield,
Mickey (ZB8637)
DN: cn=Mayfield, Mickey
(ZB8637)
Date: 2017.10.12 12:18:03 -0700

Mick Mayfield

Udall, Brian
X (Z08978)

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(Z08978)
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Reason: APS Responsible
Engineer
Date: 2017.10.12 07:23:31 -07'00'

Brian Udall

Craig,
Ashley
X (ZP2435)

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Ashley (ZP2435)
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Reason: Transmitting on Behalf
of Mick Mayfield
Date: 2017.10.12 12:34:43
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Ashley Craig

Cc: Allan Remund
Ewa Kusnier
Mathew Cox
Carl Stephenson
Hani Al-Nakib
Patrick Burch
Brian Udall
Phillip Relph
Abel Craig

KONECRANES®

Lifting Businesses™

August 24, 2017

Mr. Mick Mayfield
SR Project Manager
Engineering Projects Department
Palo Verde Nuclear Generating Station
5801 S. Wintersburg
Tonopah, AZ 85354

SUBJECT: APS POLAR CRANE MODIFICATION
JUSTIFICATION FOR USING NYLATRON® GSM BLUE SHEAVES

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If you have any questions, please do not hesitate to contact me at your earliest convenience.

Sincerely,



Customer Approval Signature / Date

Jay D. Edmundson, P.E.
Chief Engineer

Konecranes Nuclear Equipment & Services LLC

AI 17-14312-01

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Mick Mayfield
Fukushima Project Manager
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Jay D. Edmundson, P.E.
Chief Engineer