

# 10 CFR 71.95 REPORT EVALUATION FORM

**Docket No.:** 71-9233

**Package Model No.:** TN-RAM

**Report Submitter, Date,**

**ADAMS Accession No.:** Don Shaw, TN Americas LLC, April 19, 2017, ML17181A512; David Hamilton, FirstEnergy Nuclear Operating Company, June 8, 2017, ML17159A702; Jim Shaw, Nebraska Public Power District, June 13, 2017, ML17173A141; Marty L. Richey, FirstEnergy Nuclear Operating Company, June 14, 2017, ML17171A360; S. M. Bono, Tennessee Valley Authority, June 15, 2017, ML17170A073; Larry Nicholson, Florida Power & Light Company, June 15, 2017, ML17170A117; Keith J. Polson, DTE Electric Company, June 16, 2017, ML17167A324; Eric Carr, PSEG Nuclear LLC, June 16, 2017, ML17167A135; Mark D. Sartain, Virginia Electric and Power Company, July 10, 2017, ML17195A249; William F. Maguire, Entergy Operations, Inc., November 13, 2017, ML17325B003; Martha J. Kass, US Department of Energy, December 15, 2017, ML17356A170.

Review the incoming report to determine if additional Commission or staff action is warranted. The review should consider whether the report identifies a generic defect or problem with the package design and the safety significance of the issue. Note that an high safety significance represents a potential for significant radiation exposure, medium safety significance represents a potential for some moderate radiation exposure, and low safety significance represents little or no potential for radiation exposure.

## 1. The report identifies:

- ☐ Significant reduction in the effectiveness of a package during use;
- ☐ Defect with a safety significance;
- ☒ Shipment in which conditions of the approval were not observed.

**2. What is the safety significance?** ☐ High ☐ Medium ☒ Low

## 3. Summary of the report:

During April 2017, TN Americas LLC (TN), discovered that the attachment points not intended for package lifting or tie-down were routinely not rendered inoperable for transport operations as required by 10 CFR 71.87(h) and 49 CFR 173.41(b). Immediate action was taken to install a cover on each impact limiter lifting lug retained by a bolt installed in the lifting lug through hole, which renders the attachment point inoperable. In addition to installing the cover, a durable marking, stating "IMPACT LIMITER LIFTING ONLY," was placed near each impact limiter lifting lug to identify the intended use of the lifting lugs. TN notified the past users of the TN-RAM package so that they could report the non-conformance in accordance with 10 CFR 71.95 and provided them with a template 71.95 report.

## 4. Corrective actions taken by the licensee:

TN installed a cover on each impact limiter lifting lug retained by a bolt installed in the lifting lug through hole, which renders the attachment point inoperable. In addition to installing the cover, a durable marking, stating "IMPACT LIMITER LIFTING ONLY," was placed near each impact limiter lifting lug to identify the intended use of the lifting lugs. A clarification for the intended use of impact limiter lifting lugs and requirement for rendering the impact limiter

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lifting lugs inoperable during transport was added to the Chapter 7, "Operations and Maintenance and Acceptance Testing" chapter of the safety analysis report as part of an amendment request.

## 5. Staff comments:

Multiple reports from various licensees in reference to many shipments due to the issue being dependent on the CoC holder. Since no transportation incident has ever occurred because of the non-compliance, no safety significance is ascribed to the issue. Staff reviewed the report and determined this incident is neither safety significant nor indicative of a trend.

## 6. Staff conclusion:

- ☒ The report does NOT identify generic design or license/certificate issues that warrant additional Commission or staff action. This report is considered closed.
- ☐ There is a need to take additional action. Provide a summary of the bases and recommended actions:

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ADAMS Accession No.: ML18073A017

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