NRR-DRMAPEm Resource

From: David Lochbaum <davelochbaum@gmail.com>
Sent: Wednesday, October 2, 2019 8:52 AM
To: Goetz, Sujata
Subject: [External_Sender] Reactor building crane design rating - Fermi Unit 2
Attachments: 20191000-f2-lochbaum-crane-rating.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Goetz:

Attached is a digital copy of a letter requesting that the NRC pinpoint the design and licensing basis for the reactor building crane at Fermi Unit 2.

As the letter explains, there are several documents, both originating from the licensee as well as from the NRC, that refer to a 125-ton rating. But the only documents I can find of a legal nature (i.e., 50.91, 50.59, NRC SER, etc.) establishing the rating date back to 1999 and 2001 where the licensee and NRC explicitly state the rating to be 117 tons. If the crane were subsequently legally re-rated to 125 tons, I was unable to find such documents in ADAMS despite many hours spent searching for them.

Thanks,
Dave Lochbaum
423-488-8318, mobile

Hearing Identifier: NRR_DRMA
Email Number: 278

Mail Envelope Properties (CAKUfAtec=JpNccF6xZeogS_cf7xFGUsJYmhiFSk-=qDiZnBsUQ)

Subject: [External_Sender] Reactor building crane design rating - Fermi Unit 2
Sent Date: 10/2/2019 8:52:20 AM
Received Date: 10/2/2019 8:53:16 AM
From: David Lochbaum

Created By: davelochbaum@gmail.com

Recipients:
"Goetz, Sujata" <Sujata.Goetz@nrc.gov>
Tracking Status: None

Post Office: mail.gmail.com

Files	Size	Date & Time
MESSAGE	732	10/2/2019 8:53:16 AM
20191000-f2-lochbaum-crane-rating.pdf	2897862	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received: Follow up

October 2, 2019

Sujata Goetz
Project Manager, Fermi Unit 2
U.S. Nuclear Regulatory Commission

SUBJECT: Rating of Reactor Building Crane

Dear Ms. Goetz:

While reviewing documents about spent fuel cask transfers at Fermi Unit 2, I was unable to determine the design and licensing basis rating for the reactor building crane. As described in the attachment, the documents revealed both a 117-ton rating and a 125-ton rating. Recognizing that ratings can change, I searched ADAMS for either a 50.91 amendment or a 50.59 safety evaluation that explained how a 117-ton rating was upgraded to a 125-ton rating. I found neither explanation. Best I can tell from the documents found, the most recent NRC-approved rating is for 117 tons.

Hopefully, the reactor building crane is designed, tested, and maintained for the 125-ton HI-TRAC casks it will be handling and an NRC-approved process can be found to legally support that rating.

I respectfully request that the NRC establish the current licensing basis for the rating of the reactor building crane at Fermi Unit 2 and verify that all applicable testing, training, and maintenance procedures at Fermi are consistent with this basis. I also ask that the NRC make the documents that define the crane's licensing basis be made publicly available, if they are not already so.

Please note that I am not alleging that crane lacks the required rating pedigree, unless activating the NRC's allegations process is the most suitable means for the NRC to resolve this matter. Likewise, I am not petitioning under 10 CFR 2.206 for enforcement action against this licensee.

Sincerely,

David Lochbaum
423-488-8318, mobile
davelochbaum@gmail.com

Reviewed Safety Question

The NRC-approved design and licensing basis for the rating of the reactor building crane used to move spent fuel casks at Fermi Unit 2 is:

A. 117 tons

B. 125 tons

C. Clearly confusing

The evidence in the case supporting the approved design and licensing basis rating of the Fermi Unit 2 reactor building crane being 117 tons (or, Answer A is the right answer to the non-rhetorical question posed.)

Douglas R. Gipson
Senior Vice President, Nuclear Generation

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Detroit Edison

10CFR50.92

November 19, 1999
NRC-99-0084

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Proposed Technical Specification Changes
(License Amendment) –Design Features/Fuel Storage
(Technical Specification 4.3) and Programs and Manuals/High
Density Spent Fuel Racks (Technical Specification 5.5.13)

Pursuant to 10CFR50.90, Detroit Edison hereby proposes to amend the Fermi 2 Plant Operating License NPF-43, Appendix A, Technical Specifications (TS), to change: (1) the design features description of the fuel storage equipment and configuration to allow an increase in the spent fuel storage capacity and (2) the description of high density spent fuel racks program to clarify that surveillance program is applicable only to racks containing Boraflex as a neutron absorber.

Enclosure 1 provides a description and evaluation of the proposed TS changes. Enclosure 2 provides an analysis of the issue of significant hazards consideration using the standards of 10CFR50.92. Enclosure 3 provides the marked up pages of the existing TS to show the proposed changes and a typed version of the affected TS pages with the proposed changes incorporated. Enclosure 4 provides a licensing

On November 19, 1999, Fermi-2's owner submitted a license amendment request to the NRC.

Source: ML993440109

ENCLOSURE 5 TO
NRC-99-0084

FERMI 2

NRC DOCKET NO. 50-341
OPERATING LICENSE NPF-43

LICENSING REPORT FOR FERMI 2
SPENT FUEL POOL RACK INSTALLATION

Holtec Report HI-992154, Revision 6
Non-Proprietary Version

Enclosure 5 to the submittal to the NRC was a non-proprietary version of a licensing report supporting the installation of new racks in the spent fuel pool at Fermi Unit 2.

Source ML993440246

10.0 INSTALLATION

10.1 Introduction

To realize the proposed in-pool capacity expansions in the Fermi 2 spent fuel pool, Holtec International and DECo will have to carry out installation activities at the Fermi 2 site which involve rigging and handling of heavy loads, contamination control, and radiation protection considerations. In this chapter, a synopsis is provided of the heavy load considerations and the site operation procedures to carry out the proposed plant modification with utmost safety and minimum dose to the plant personnel.

10.2 Heavy Load Considerations for the Proposed Reracking Operation

The 117-ton single failure-proof cask handling crane will be utilized for lifting the racks from the first floor of the Reactor Building and placing them into the spent fuel pool. Final placement of the racks within the spent fuel pool will be performed using a combination of the cask handling crane and the 5-ton auxiliary crane. An additional temporary hoist with sufficient capacity shall also be used to prevent submergence of the cask handling and auxiliary crane hooks.

A remotely engageable lift rig, which meets NUREG-0612 stress criteria, will be used to lift the new modules. It consists of independently loaded lift rods that engage at the underside of the solid baseplate in the rack. This ensures that failure of one lift rod will not result in uncontrolled lowering of the load, compliant with Section 5.1.6(1) of NUREG-0612. The remotely engageable lift rig also has the following attributes:

a. The stresses in the lift rods are self-limiting inasmuch as an increase in the magnitude of the load reduces the eccentricity between the upward force and downward reaction (moment arm).

b. It is impossible for a lift rod to lose engagement with the lifted rack because the downward load secures each rod in its locking slot. Moreover, the locked configuration can be directly verified from above the pool water without the aid of an underwater camera by the orientation of position locator flags atop each lift rod.

Section 10.2 of this non-proprietary licensing report explicitly stated that the new racks would be installed using "the 117-ton single failure-proof cask handling crane" (defined elsewhere in the report as being the reactor building crane.)

Source ML993440246

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 25, 2001

Mr. William T. O'Connor, Jr.
Vice President - Nuclear Generation
Detroit Edison Company
6400 North Dixie Highway
Newport, MI 48166

SUBJECT: FERMI 2 - ISSUANCE OF AMENDMENT RE: SPENT FUEL POOL RERACK (TAC NO. MA7233)

Dear Mr. O'Connor:

The Commission has issued the enclosed Amendment No. 141 to Facility Operating License No. NPF-43 for the Fermi 2 facility. The amendment consists of changes to the Technical Specifications (TSs) in response to your application dated November 19, 1999, as supplemented May 31, August 2, October 19, and November 21, 2000.

The amendment revises the TSs by changing (1) the design features description of the fuel storage equipment and configuration to allow an increase in the spent fuel pool (SFP) storage capacity and (2) the description of the high-density spent fuel racks program to clarify that the surveillance program is applicable only to racks containing Boraflex as a neutron absorber. Specifically, the amendment revises the TSs to increase the capacity of the SFP from 2,414 to 4,608 fuel assemblies.

A copy of our safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

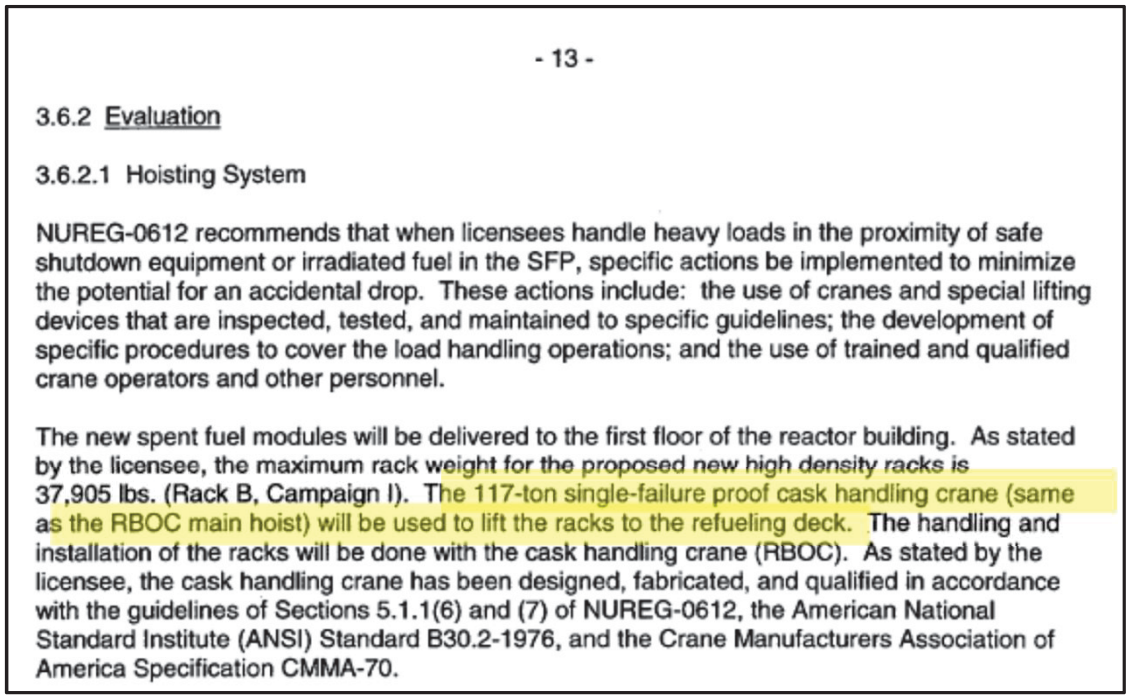
Sincerely,

John G. Lamb

John G. Lamb, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

On January 25, 2001, the NRC issued an amendment approving the installation of the new spent fuel racks.

Source ML010310205



- 13 -

3.6.2 Evaluation

3.6.2.1 Hoisting System

NUREG-0612 recommends that when licensees handle heavy loads in the proximity of safe shutdown equipment or irradiated fuel in the SFP, specific actions be implemented to minimize the potential for an accidental drop. These actions include: the use of cranes and special lifting devices that are inspected, tested, and maintained to specific guidelines; the development of specific procedures to cover the load handling operations; and the use of trained and qualified crane operators and other personnel.

The new spent fuel modules will be delivered to the first floor of the reactor building. As stated by the licensee, the maximum rack weight for the proposed new high density racks is 37,905 lbs. (Rack B, Campaign I). The 117-ton single-failure proof cask handling crane (same as the RBOC main hoist) will be used to lift the racks to the refueling deck. The handling and installation of the racks will be done with the cask handling crane (RBOC). As stated by the licensee, the cask handling crane has been designed, fabricated, and qualified in accordance with the guidelines of Sections 5.1.1(6) and (7) of NUREG-0612, the American National Standard Institute (ANSI) Standard B30.2-1976, and the Crane Manufacturers Association of America Specification CMMA-70.

Section 3.6.2.1 of the safety evaluation prepared by the NRC to support its approval explicitly stated that "the 117-ton single-failure proof cask handling crane" (defined as being the reactor building overhead crane, RBOC) will be used to install the new racks.

Source ML010310205

Thus, the owner and the NRC seem to agree – at least in the 1999-2001 time-frame – that the reactor building crane at Fermi Unit 2 has a 117-ton rating.

The evidence in the case supporting the approved design and licensing basis rating of the Fermi Unit 2 reactor building crane being 125 tons (or, Answer B is the right answer to the non-rhetorical question posed.)

On November 15, 2000, (between the owner's license amendment request and the NRC's approval) the owner submitted Revision 10 to the Fermi Unit 2 Updated Final Safety Analysis Report (UFSAR) to the NRC.

Source ML003772047

William T. O'Connor, Jr.
Vice President, Nuclear Generation

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Detroit Edison

A DTE Energy Company

November 15, 2000
NRC-00-0068

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D C 20555-0001

References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

2) Fermi 2 Letter to NRC (NRC-98-0156)
dated October 16,1998, "Status of the
Fermi 2 UFSAR Validation and other 50.54(f)
Response Initiatives"

3) Fermi 2 Letter to NRC (NRC-98-0092)
dated June 29, 1998, "Issuance of Technical
Requirements Manual Volume 1 to the Holders
of the Updated Final Safety Analysis Report"

Subject: Submittal of Revision 10 to the Fermi 2
Updated Final Safety Analysis Report

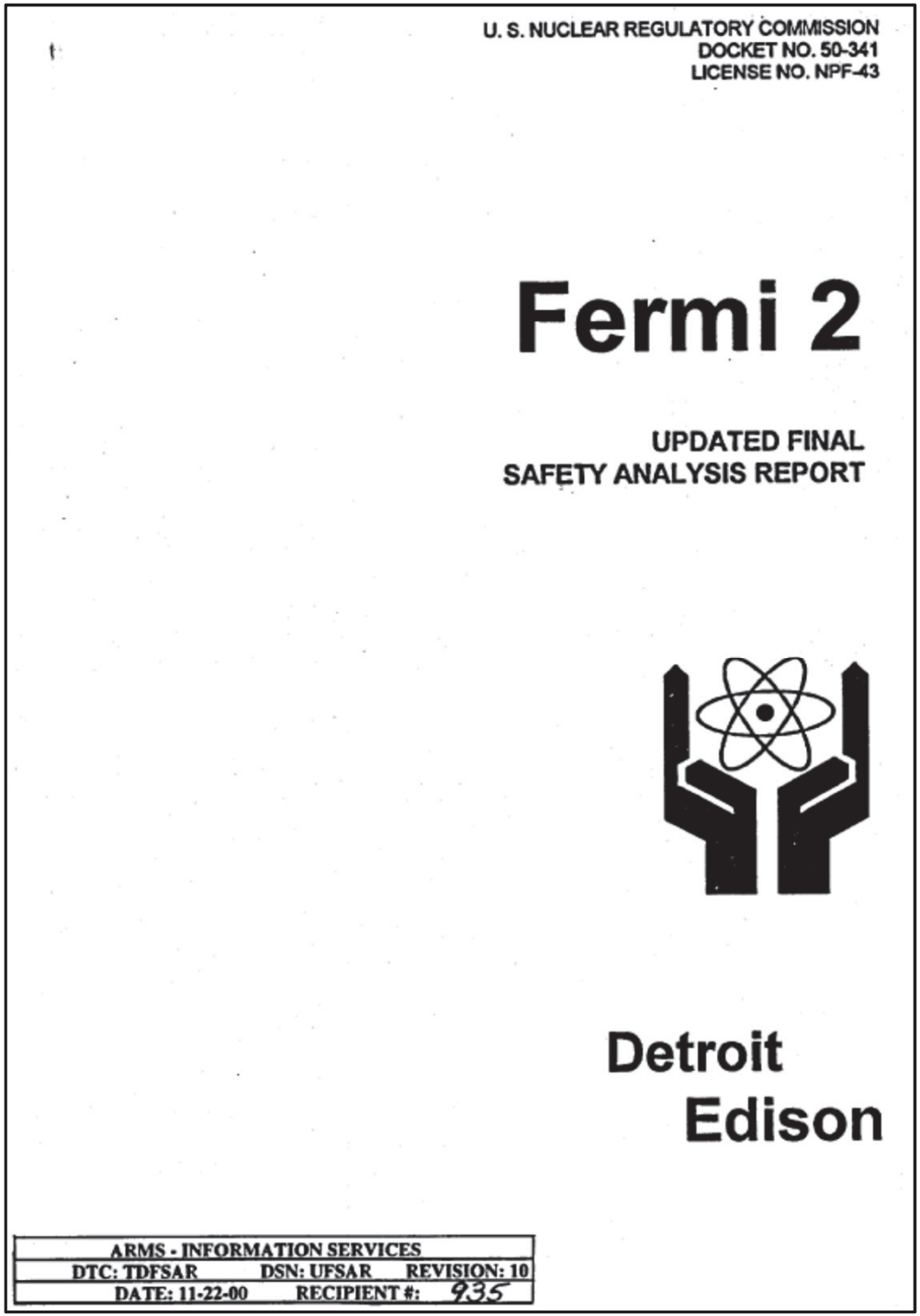
Pursuant to 10 CFR 50.71(e) and 10 CFR 50.4(b)(6), Detroit Edison hereby submits Revision 10 to the Fermi 2 Updated Final Safety Analysis Report (UFSAR).

One original and ten additional copies of the UFSAR, Revision 10, are being submitted to the Document Control Desk. In addition, one copy is being submitted to Region III and one copy to the NRC Resident Inspector. Changes associated with Revision 10 are annotated by revision bars in the appropriate margin. All revised pages are marked "REV 10 11/00" in the lower right-hand corner.

In accordance with 10 CFR 50.71(e) the information provided in this submittal describes the plant configuration through May 23, 2000 as a minimum and reflects changes made since Revision 9 that were made under the provisions of 10 CFR 50.59. This revision also includes the correction of a number of discrepancies that

§50.34 of Title 10 to the Code of Federal Regulations requires owners to submit UFSARs to the NRC. UFSARs describe the plant's design and the safety studies explaining how the design and operation will conform to all applicable safety requirements.

§50.71 requires owners to periodically update the UFSARs and provide the NRC with the latest revision.



U. S. NUCLEAR REGULATORY COMMISSION
DOCKET NO. 50-341
LICENSE NO. NPF-43

Fermi 2

UPDATED FINAL
SAFETY ANALYSIS REPORT

Detroit
Edison

ARMS - INFORMATION SERVICES
DTC: TDFSAR DSN: UFSAR REVISION: 10
DATE: 11-22-00 RECIPIENT #: 935

9.1.4.2.2 Reactor Building Crane

An overhead traveling (reactor building) crane is utilized in the Fermi 2 reactor building to handle heavy objects, including the spent fuel cask. The essential design bases applicable to Fermi 2 spent fuel cask handling are:

a. To minimize, to the maximum extent practical, the probability of dropping heavy objects into the fuel storage pool resulting in damage to fuel or compromising the integrity of the pool

UFSAR pages 9.1-29 to 9.1.31 described the reactor building crane and explicitly stated it as having a 125-ton design rating.

Crane operations over the spent fuel storage pool when fuel assemblies are stored therein are not allowed when either of the following conditions occur:

- less than 22 feet of water over the top of irradiated fuel assemblies seated in the spent fuel storage pool racks.
- less than the Technical Specification required ac electrical power sources operable, when in modes 4, 5 and when handling irradiated fuel in the secondary containment.

Prior to suspending crane operations, fuel assemblies shall be placed in a safe condition.

The reactor building crane is of the single trolley top running type, carried on two main girders. The girders have a rated lifting capacity of 125 short tons and a span of 113 ft 9 in. Power is applied by twin hoist motors through two gearboxes to the two drum gear rings, located on each end of the drum. In this manner, the hoist mechanism is duplicated. In normal operation, the twin hoist trains share the load, but each is separately able to carry the rated load at allowable code stresses, thus providing adequate safety should one gear train fail. Both hoist trains are provided with electrical and electromechanical type brakes; each of the latter is capable of sustaining the load should a mechanical failure occur in a gear train. Each mechanical brake is sized for 150 percent motor

For the Fermi 2 crane, the wire rope safety factor for each single wire rope is 9. This is determined by dividing the design rated load (125 tons) by the number of load-carrying parts (16) and the efficiency factors (0.933) and comparing the result with the published breaking strength of 76.1 tons for the rope dimensions of 6 x 41 x 1-1/4 in. The design of the dual reeving system is consistent with paragraph 3.f of BTP ASB 9-1.

In both the lower and upper blocks, the sheaves are mounted in a structural cage system having supporting plates on each side of each sheave. Thus, the load being carried by the sheave pin is shared by each of these support plates. Should a pin fail on any one particular sheave, the adjacent sheave still maintains its integrity. This allows either reeving system to take over the entire load.

The Fermi Unit 2 UFSAR was updated in October 2017 to Revision 21.

UFSAR page 9.1-29 describes the reactor building crane and explicitly stated it to have a 125-ton design rating.

For the Fermi 2 crane, the wire rope safety factor for each single wire rope is a minimum of 10. This is determined by dividing the design rated load (125 tons) by the number of load-carrying parts (16) and the efficiency factors (0.933) and comparing the result with the published breaking strength of 102 (nominal) tons for the 1-1/4 in. (nominal) diameter rope. The design of the dual reeving system is consistent with paragraph 3.f of BTP ASB 9-1.

In both the lower and upper blocks, the sheaves are mounted in a structural cage system having supporting plates on each side of each sheave. Thus, the load being carried by the sheave pin is shared by each of these support plates. Should a pin fail on any one particular sheave group, the adjacent sheave still maintains its integrity. This allows either reeving system to take over the entire load.

The main hook block is provided with a conventional hook, and the redundant feature is provided by two smaller hooks, each capable of sustaining 50 percent of the rated load at code stresses. The two additional hooks are individually mounted on their own pins and

In July 2016, the NRC issued its Safety Evaluation Report supporting its approval of the License Renewal Application (LRA) for Fermi Unit 2.

Safety Evaluation Report

Related to the License Renewal of Fermi 2

Docket No. 50-341

DTE Electric Company

United States Nuclear Regulatory Commission

Office of Nuclear Reactor Regulation

July 2016

Section 4.7.7.1 addressed the reactor building crane, explicitly stated to have a 125 ton capacity.

4.7.7 Crane (Heavy Load) Cycles

4.7.7.1 Summary of Technical Information in the Application

LRA Section 4.7.7 describes the applicant's TLAA related to the crane (heavy load) cycles for the reactor building crane. The LRA states that the reactor building crane meets the structural guidelines of Crane Manufacturers Association of America Specification No. 70 (CMAA-70), which provides allowable stress ranges based on joint category and service class. The LRA states that the lowest range of cycles for CMAA-70 Class A cranes is 20,000 to 100,000 cycles. Because of the cycles associated with such classification, the LRA states the analysis related to the CMAA-70 lift cycle limit is considered to be a TLAA. The LRA states that the reactor building crane has a capacity of 125 tons and it is used infrequently for refueling operations, service and maintenance of the reactor, equipment moved through the equipment access lock, and will be used during decommissioning. The LRA also states that the total number of crane lifts of over 20,000 lb (10 tons), are projected to be 2,868, which they have increased by applying a 25 percent margin to arrive at a projected number of 3,585 crane lifts. The LRA further states that lifts during construction and decommissioning are considered by doubling the 3,585 lifts. Accordingly, the estimated total number of lifts for the reactor building overhead crane would be 7,170, which is below the 100,000 cycles established in CMAA-70 for Class A service cranes.

Thus, the owner and the NRC seem to agree – at least in the 2000, 2016 and 2017 time-frames – that the reactor building crane at Fermi Unit 2 has a 125-ton rating.

The evidence in the case supporting the approved design and licensing basis rating of the Fermi Unit 2 reactor building crane being clearly confusing (or, Answer C is the right answer to the non-rhetorical question posed.)

11-19-1999	Owner informed NRC in writing about a 117-ton crane.
11-15-2000	Owner provided NRC with UFSAR Rev. 10 specifying a 125-ton rated crane.
01-25-2001	NRC issued amendment based on using a 117-ton crane
07-2016	NRC issued license renewal Safety Evaluation Report, including a 125-ton crane

Thus, the owner and the NRC seem to agree that the reactor building crane at Fermi Unit 2 has a 117-ton, or a 125-ton rating – somewhere in that ballpark

The NRC-approved design and licensing basis for the rating of the reactor building crane used to move spent fuel casks at Fermi Unit 2 is:

A. 1[illegible] tons

B. 1[illegible] tons

C. Clearly confusing

In November 1999, the owner told the NRC that it wanted to use a 117-ton crane to install new storage racks in the spent fuel pool.

In November 2000, the owner submitted a UFSAR revision to the NRC that stated the crane had a design rating of 125-tons.

In January 2001, the NRC approved the installation of new spent fuel storage racks based on its written understanding that a 117-ton crane would be used.

In July 2016, the NRC approved license renewal of the reactor based on its written understanding that the crane has a 125-ton capacity.

While the difference is small (if an 8-ton variation can be considered small), the implications are big.

§ 54.3 of Title 10 of the Code of Federal Regulations states:

"*Current licensing basis* (CLB) is the set of NRC requirements applicable to a specific plant and a licensee's written commitments for ensuring compliance with and operation within applicable NRC requirements and the plant-specific design basis (including all modifications and additions to such commitments over the life of the license) that are docketed and in effect. The CLB includes the NRC regulations contained in 10 CFR parts 2, 19, 20, 21, 26, 30, 40, 50, 51, 52, 54, 55, 70, 72, 73, 100 and appendices thereto; orders; license conditions; exemptions; and technical specifications. It also includes the plant-specific design-basis information defined in 10 CFR 50.2 as documented in the most recent final safety analysis report (FSAR) as required by 10 CFR 50.71 and the licensee's commitments remaining in effect that were made in docketed licensing correspondence such as licensee responses to NRC bulletins, generic letters, and enforcement actions, as well as licensee commitments documented in NRC safety evaluations or licensee event reports." [underlining added for emphasis]

The Current Licensing Basis (CLB) is not merely an archival exercise blazing paper trails.

Workers follow the CLB paper trail to ensure the reactor is being operated within safety bounds approved by the NRC, thus managing the risk to an acceptably low, but not zero, level.

Similarly, the NRC's inspectors and reviewers follow the CLB paper trail to independently verify that the reactor's inherent risk is being adequately managed.

Neither workers nor the NRC can do their jobs properly when they encounter forks in the paper trail.

As implied by the requirement to periodically revise the UFSARs, the CLB is not static but frequently changing.

Under §50.91, owners can apply to the NRC to amend the CLB, as the owner did in November 1999 to rerack the spent fuel pool.

Under §50.59, owners can also change the CLB without prior NRC approval as long as the change are formally evaluated to remain within safety boundaries previously approved by the NRC.

Speaking of paper trails, use of §50.91 and §50.59 are supposed to leave publicly available paper trails. ADAMS, the NRC's online digital library, was searched extensively for a §50.91 or §50.59 paper trail for the reactor building crane's 117-ton rating being legally upgraded to 125-tons.

§50.91 paper trails entail at least two documents per approved change (i.e., the request by the owner and the approval by the NRC) and often entail several other documents (e.g., requests by the NRC for additional information about the proposed change and the responses from the owner providing the requested information.)

Other than the January 2001 amendment citing a 117-ton crane, no §50.91 paper trail involving the reactor building crane's rating was found.

SAFETY EVALUATIONS
UFSAR
PAGE 12

SAFETY EVALUATION SUMMARY

Safety Evaluation No: 98-0140 **UFSAR Revision No.** 10

Reference Document: LCR 98-140-UFS **Section(s)** 5.5.6.3.6
5.5.7.3.2, 5.5.7.3.3
Table(s) NA

Figure Change ☐ Yes ☒ No

Title of Change: UFSAR Validation Project-Discrepancies Between the UFSAR and the System Operating Procedure for the Residual Heat Removal System

SUMMARY:

The UFSAR Validation Project identified discrepancies between the UFSAR Summary and System Operating Procedure (SOP) 23.205 regarding the operation of the Residual Heat Removal (RHR) system. These differences were investigated, and LCR 98-140-UFS was prepared to revise the UFSAR to more accurately summarize the SOP.

The UFSAR was revised to accurately reflect the operation of the RHR System in accordance with approved plant procedure, SOP 23.205. The revision includes:

1. Section 5.5.6.3.6, Auxiliary Heat Removal Operation describes necessary actions for the operator to place the RHR system in the suppression cooling mode emergency operations.

2. Section 5.5.7.3.2, Shutdown Cooling, to state "Reactor coolant can be returned to the RPV through either RRS loop."

3. Section 5.5.7.3.3, Containment Cooling Subsystem, will delete the valve lineup for Suppression Pool cooling which was incorrect and is not needed.

These changes update the UFSAR to reflect the existing, as analyzed, proceduralized operation of the RHR System. They have no adverse affect on any equipment important to safety or on the ability to achieve and maintain the safe shutdown of the plant. The required changes to the UFSAR are in accordance with the existing design basis of the plant as reflected in SOP 23.205. These changes have no safety significance and do not represent an unreviewed safety question.

Literally thousands of summaries, like this typical example, by the owner per §50.59 were reviewed, but none were explaining the upgraded crane.

Source ML003771657
Others reviewed include:
ML003771303 (11-17-2000)
ML003768518 (10-30-2000)
ML003762039 (10-11-2000)
ML003757861 (09-26-2000)
ML003757854 (09-25-2000)
ML003753202 (09-15-2000)
ML003747333 (08-28-2000)
ML003740851 (08-04-2000)
ML003736225 (07-20-2000)
ML003734885 (07-14-2000)
ML003731360 (06-29-2000)
ML003727856 (06-16-2000)
ML003722975 (06-01-2000)
ML003710350 (04-20-2000)
ML003704259 (04-10-2000)
ML003701348 (04-03-2000)
ML003701402 (03-30-2000)
ML003695157 (03-15-2000)
ML003686342 (02-08-2000)
ML003680855 (01-27-2000)
ML003678950 (01-19-2000)
ML003670758 (12-15-1999)
... and so yawn

The NRC-approved design and licensing basis for the rating of the reactor building crane used to move spent fuel casks at Fermi Unit 2 is:

A. 117 tons

B. 125 tons

C. Clearly confusing

As described above, strong cases can be made for any of these three answers being "right."

The NRC-approved design and licensing basis for the rating of the reactor building crane used to move spent fuel casks at Fermi Unit 2 is:

A. 117 tons

B. 125 tons

C. Clearly confusing

But public health and the law demand that this safety question have but one "right" answer – and that answer must NOT be C.

Before the next load weighing more than 115 tons is lifted by the reactor building crane at Fermi Unit 2, the NRC should determine whether the crane's design and licensing basis is a 117-ton rating, a 125-ton rating, or some other value.

Determining the "right" rating should identify the paper trail followed to establish it.

If the NRC discovers that the owner did a little "off-roading" to create a rating without following an NRC-approved path, appropriate sanctions should be imposed.