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Date: Tue, 13 Mar 2001 09:39:44 -0500
To: Everyone@holtec.com
From: Mark Soler <Mark_Soler@holtec.com>
Subject: Dry Storage Design Changes

A concern was recently raised regarding the control of design changes on dry cask storage projects. The specific issue dealt with design changes in the 100S drawings that were made between the old drawings and the new Solid Work system. The following problems were found:

1) An ECO was not generated. HQP 5.1, paragraph 6.8.1.3 requires that an ECO be generated whenever the design change affects documents other than drawings (ie. Licensing Reports, calculation packages) and these documents will not be modified until later. Furthermore, it is not apparent as to whether all documents that will require revision due to design changes have been put on the task database. **The purpose of this requirement is to provide a tracking mechanism so that all required documents are revised. All documents including calculation packages, licensing reports, procedures etc. must be listed. While the ECO process may not be the most efficient process to use, it is the only process at the current time which provides tracking and sorting capabilities for design changes.**

2) The specific changes made were not identified in the drawing change summary sheet or the 72.48 database. **Without the specific changes being identified, we rely on the memory of personnel to recall the changes when 72.48s are completed.**

3) The 72.48 was not completed including the screening section. **While it was recognized that some 72.48s would require analysis and FSAR markups and that the time to complete these activities could cause significant delays relative to fabrication, it was expected that the majority of 72.48s (at least the screening) for new ECOs and SMDRs would be generated at the time of issuance of the document. The exception would be the occasional 72.48 that needed to be completed after issuance of the document. Instead, it appears that the majority of ECOs and SMDRs are being generated and no part of the 72.48 is being completed.**

From this point forward, the following requirements shall apply to any design change on the dry storage side that is generated due to a ECO, SMDR, drawing change, procedural change etc.

- 1) At a minimum, the screening section of the 72.48 must be completed.
- 2) If the screening section of the 72.48 determines that a full 72.48 is required and the 72.48 is not immediately completed, then an activity for completing the 72.48 shall be input into the task database.
- 3) Any calculation, FSAR markup, etc. that is not immediately completed to support the design change and/or 72.48 must be input into the task database.
- 4) Task database entrees shall include the ECO, SMDR, 72.48 number as appropriate.
- 5) New drawings for dry storage such as a new MPC design are considered design changes and require completion of the Proposed Design Change Summary Sheet and Evaluation

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Checklist for Proposed Design Changes.

6) For new drawings where drawing revisions were made rather than ECOs, an ECO needs to be generated if the change impacts other documents.

There are also four very important rules to follow:

1) PMs are given the responsibility to determine which technical disciplines need to review a design change. It is better to err on the side of conservatism rather than not getting a technical review done. If there is any question as to whether a particular discipline may be impacted by the change, get the discipline to review.

2) Technical disciplines must be absolutely positive regarding the acceptability of a change.

3) PMs and technical disciplines must be *confident* that a particular change will be able to be made by a 72.48 process. While a design change may make technical or fabrication sense, it may violate a COC requirement or may reduce margins below acceptable limits which would negate the ability to perform a 72.48 process. Do not let schedule affect your judgement or ability to say "WAIT, I NEED TO LOOK AT THIS MORE CAREFULLY".

4) All design changes must be reviewed and approved by licensing. The drawing approval database will be revised to add licensing as a discipline for approval. Licensing approval of drawings will be required if an ECO was not generated for a design change.

5) All 72.48 evaluations (as required), including FSAR markups and completion of calculation revisions that were required during fabrication should be completed before the hardware ships to the client unless approval for an extension is granted by the VP, Nuclear Projects.

Please contact me or Brian if you have any questions.

→ All docs affected FSAR.