



Entergy Nuclear Northeast
Indian Point Energy Center
295 Broadway, Suite 1
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Buchanan, NY 10511-0249

Fred Dacimo
Site Vice President
Tel 914 734 6700

April 12, 2005

Re: Indian Point, Unit No. 2
Docket No. 50-247
NL-05-030

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

Subject: Reply to RAI regarding Amendment Application for Fuel Storage Building Gantry Crane (TAC MC5036)

- References:
- 1) NRC Letter dated February 25, 2005; Request for Additional Information Regarding Amendment Application for Fuel Storage Building Gantry Crane (ML043140282)
 - 2) Entergy letter dated November 1, 2004 LICENSE AMENDMENT REQUEST (LAR) – Fuel Storage Building Single-Failure-Proof Gantry Crane

Dear Sir;

Entergy Nuclear Operations, Inc. (ENO) is providing a response to the NRC request for additional information (RAI) regarding the proposed license amendment request for new Fuel Storage Building Single-Failure-Proof Gantry Crane for Indian Point 2 (IP2). The responses to the questions are provided in Attachment 1.

Attachment 2 contains Entergy drawings developed for the new installation of the floor in the Fuel Storage Building. These drawings support the response to several questions.

Attachment 3 contains two Ederer drawings used to provide additional information in responses to four of the questions in this RAI. These drawings contain proprietary information to Ederer; it is supported by an affidavit signed by Ederer, the owner of the design. The affidavit sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the consideration listed in paragraph (b) (4) of section 2.390 of the Commission's regulations. Accordingly, it is respectfully requested that the information that is proprietary to Ederer be withheld from public disclosure in accordance with 10CFR 2.390 of the Commission's regulations. Ederer authorization letter (ref F2725T43) dated April 1, 2005, with the accompanying affidavit, Proprietary Information Notice is provided in Enclosure A.

APOI

Correspondence with respect to the copyright on proprietary aspects of the items listed above or the supporting affidavit should reference F2725T43 and should be addressed to James E. Nelson, Crane Product Manager, PaR Nuclear Inc., PO Box 24708 Seattle, WA 98124-0708.

The additional supporting information provided in this letter does not alter the conclusions of the no significant hazards evaluation that supports the subject license amendment request. There are no new commitments identified in this submittal. If you have any questions or require additional information, please contact Patric Conroy, Manager, Licensing, at 914-734-6668.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 4/12/05.

Sincerely,



Fred R. Dacimo
Site Vice President
Indian Point Energy Center

Attachment 1: Additional information for IPEC Unit 2 Fuel Storage Building Gantry Crane License Amendment Request based on NRC RAI.

Attachment 2: Entergy Drawings

Attachment 3: Ederer Drawings (Proprietary)

Enclosure A: Ederer Authorization Letter Dated April 1, 2005 with accompanying affidavit and Proprietary Notice.

cc: Mr. Patrick D. Milano, Senior Project Manager
Project Directorate I,
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Mail Stop O 8 C2
Washington, DC 20555-0001

Mr. Samuel J. Collins
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U.S. Nuclear Regulatory Commission
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Resident Inspector's Office
U.S. Nuclear Regulatory Commission
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Buchanan, NY 10511

Mr. Paul Eddy
State of NY Public Service Commission
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Albany, NY 12223-1350

ATTACHMENT 1 TO NL-05-030

**REPLY TO NRC REQUEST FOR ADDITIONAL INFORMATION REGARDING
PROPOSED LICENSE AMENDMENT REQUEST FOR NEW FUEL STORAGE
BUILDING GANTRY CRANE AT INDIAN POINT 2**

**ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNIT 2
DOCKET 50-247**

Request for additional information from NRC letter dated
February 25, 2005 (Accession Number ML043140282)

Question 1:

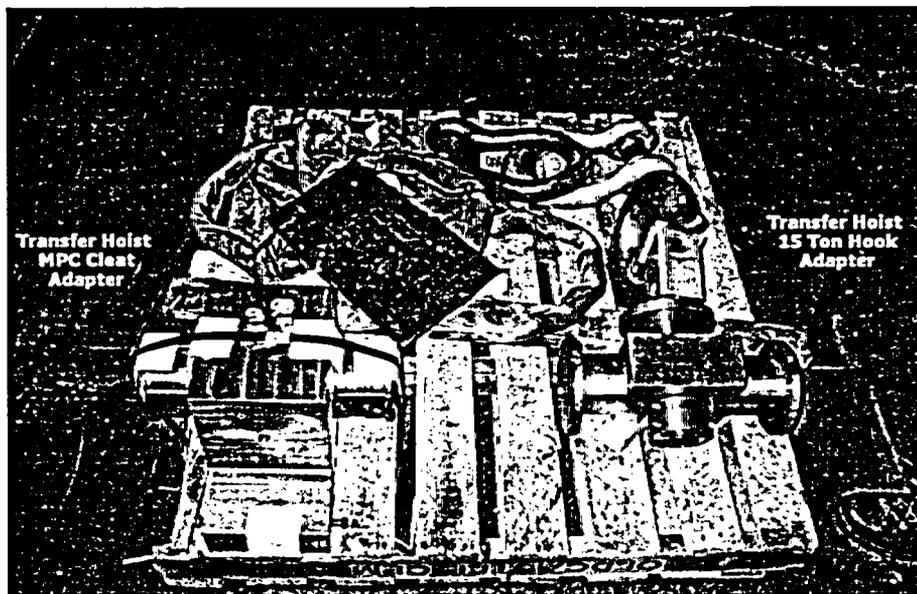
On page 3 of Attachment 1 of the November 1 letter, it states that the crane main hoist has a 110-ton capacity while an auxiliary hoist has a 45-ton capacity. On page 4, it states that the 110-ton hoist is used to lift the Holtec HI-TRAC 100 transfer cask, whereas the 45-ton hoist is used to handle the ancillary components of the HI-STORM 100 Cask System.

- a. Describe the means to ensure that the 45-ton hoist will not be inadvertently used to handle loads that exceed its rated capacity.
- b. Provide prints, if available, to show the details of the crane and its location relative to the spent fuel pool and the existing 40-ton overhead crane. Are there any postulated scenarios whereby the new crane may interfere with the existing crane (or vice versa) during load handling operations?

Question 1 Response:

- a. The new Gantry Crane to be installed in the IPEC Unit 2 Fuel Storage Building was specifically designed to handle the Holtec HI-TRAC 100D and MPC-32. Both the 110 ton and 45 ton hoists were designed to only mate up with the HI-TRAC trunions and MPC lift cleats respectively. Both hoists contain air-powered paddle ears that open/close for latching and unlatching and are not suitable for general purpose lifts without the use of a specially designed adapter. In particular, the 45 ton canister transfer hoist is designed to lift the following Holtec Equipment:

- Empty MPC-32
- Loaded MPC-32
- MPC-32 Lid



The heaviest load of the three listed above is the loaded MPC-32 which was the basis for the transfer hoist design. To prevent misuse of the canister transfer hoist, and to accommodate the transfer of the MPC-32 into the HI-STORM during stack-up, the transfer hoist does not contain a hook that can be universally used for lifting of objects. Rather, the transfer hoist is designed to accommodate an adapter that is mated to the MPC-32 lid lifting cleats to allow handling of the loaded MPC.

Movement of the empty MPC-32 inside the Fuel Storage Building will be accomplished using a 15 ton hook adapter that attaches to the transfer hoist. Since the hook capacity of the adapter is much less than the 45 ton hoist capacity, the integrity of the hoist will be preserved.

- b. The new Gantry Crane was designed with a telescoping tower and automated folding cantilever arms to avoid interference with either the existing overhead crane or refueling bridge crane. During a dry cask loading campaign, the Gantry Crane will be in its raised position, and the existing overhead crane will be administratively controlled as follows:
- Parked in the south position over the new fuel vault.
 - De-energized to prevent accidental movement.

The above controls will prevent any interference issues between the overhead crane and new Gantry Crane. After the HI-TRAC has been lowered into the fuel pool loading pit, the east arm of the new Gantry Crane will be folded back to allow the refueling bridge crane to access the MPC-32 and load the appropriate fuel elements.

After a fuel loading campaign is completed, the new gantry crane will be stored in the far west position, with its tower in the lowered position and arms folded. This allows unobstructed use of both the existing overhead and refueling bridge cranes.

Question 2:

On page 2 of Appendix B to Attachment 3, it states that the crane will not be used to lift fuel elements from the spent fuel racks. Therefore, interlocks to prevent trolley and bridge movements while hoisting were not provided.

Describe the control(s) used to ensure the crane will not be inadvertently used for other unintended purposes (e.g., lifting fuel elements from the spent fuel racks), given no interlocks are provided.

Question 2 Response:

The new Gantry Crane to be installed in the IPEC Unit 2 Fuel Storage Building was specifically designed to handle the Holtec HI-TRAC 100D and MPC-32. Both the 110 ton and 45 ton hoists were designed to only mate up with the HI-TRAC trunions and MPC lift cleats respectively. Both hoists contain air-powered paddle ears that open/close for latching and unlatching and are not suitable for general purpose lifts without the use of a specially designed adapter.

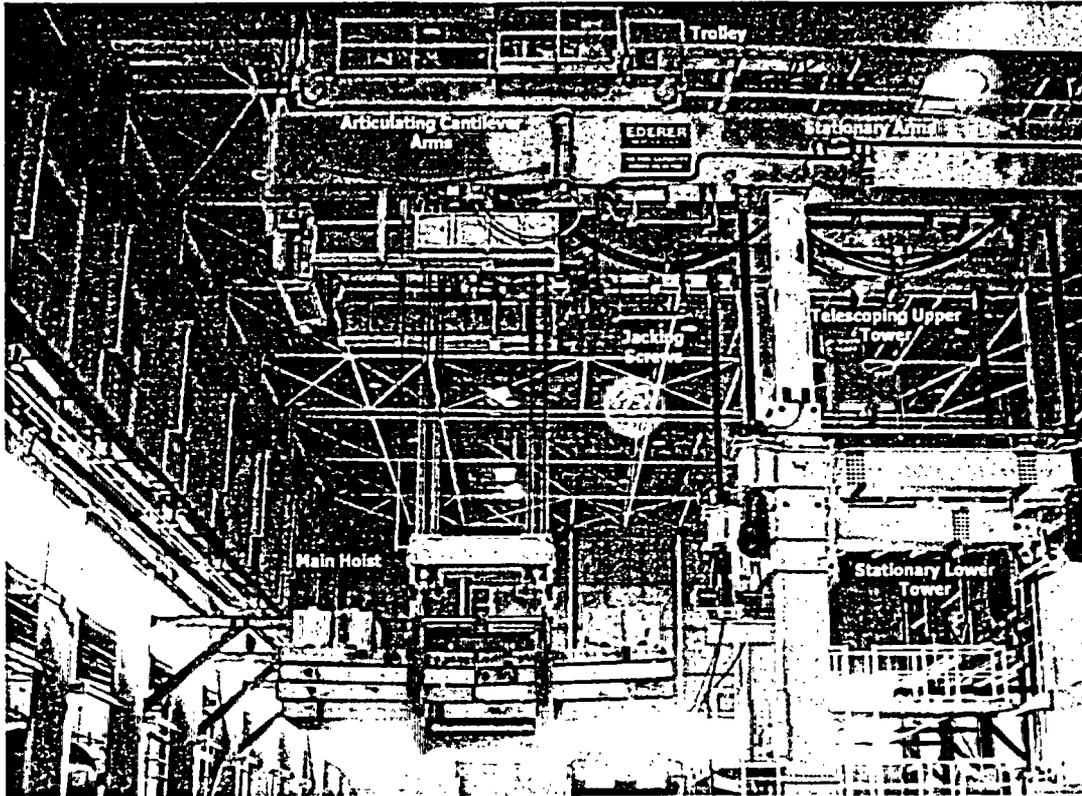
The new Gantry Crane movements are controlled by a series of limit and proximity switches that are controlled by a PLC system. Some of the protection provided by the PLC system is as follows:

- Movement of the trolley north towards the fuel pool is only permitting if the following conditions are satisfied:
 - Turnbuckles are attached to the crane tie down points.
 - Cantilever arms are extended and locked in place.
 - Main transfer hoist is at operating elevation that allows HI-TRAC to clear south wall of spent fuel pit.
- Limit switches on trolley rails limit excessive movement of trolley to the north and prohibit lowering of load until a minimum northward travel is reached.
- Main transfer hoist operation is prohibited until new Gantry Crane tower is in raised position and pinned in place.

Question 3:

In Attachment 4, it states that the entire new crane is seismically qualified by response spectrum analysis. Briefly describe the components that constitute the entire new crane.

Question 3 Response:



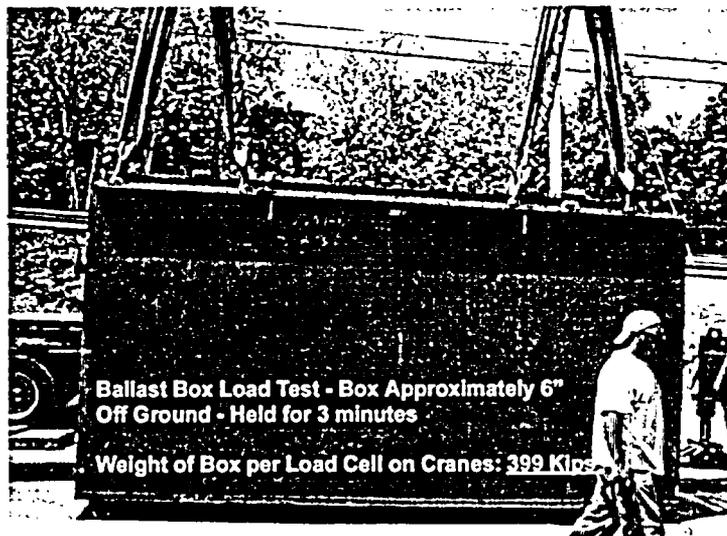
The new Gantry Crane required to handle the HOLTEC Dry Cask Storage System is a single failure proof crane designed by Ederer. The crane is primarily constructed of built up steel and box girder sections with a telescoping upper tower, fixed lower tower and articulating cantilever arms that open and close for dry cask storage operations. Up and down movement of the telescoping tower is controlled by four screw jacks and the telescoping tower is pinned in place at each leg when in the raised position. The main hoist has a capacity of 110 Tons and the canister transfer hoist 45 Tons. The crane has the capability to hold onto the HI-TRAC in the stacked position while lowering the MPC into the HI-STORM using the Canister Transfer Hoist. The trolley travels in the north-south direction along the cantilever arms and the crane structure gantries in the east-west direction. Control of the crane is accomplished through the use of limit and proximity switches tied to a PLC controller.

Question 4:

Provide drawings that show the configuration and member sizes of the proposed crane, the steel counterweight box, the crane wheel, and crane rails, and their locations in the fuel storage building. The drawing should also show how the counterweight box is embedded below the floor.

Question 4 Response:

Ederer general arrangement drawing PA-2389, (See attachment 3) shows the crane's primary features. Excerpts from the structural analysis calculation of the crane that contain the member section properties is also attached. In order to provide sufficient overturning resistance for the cantilevered gantry crane during dry cask operations, a large steel counterweight box will be placed in the southwest corner of the Fuel Storage Building, beneath the newly constructed floor.



The box measures approximately 6' W x 16.33' L x 8" H and is primarily constructed with 2" thick A36 plates for the base and walls, and 2-1/2" thick A36 material for the center plate. The tie-down turnbuckles of the new gantry crane are connected to the center plate of the counterweight box. The volume of the box will be filled with A36 plate. Drawing DMD400587-AA (See Attachment 2) provides the structural drawing of this counterweight box.

The crane rail system for the new Gantry Crane consists primarily of the following components:

- 171# crane rail
- Gantrex MK6 Rail Pad
- Gantrex Weldlok 43 Rail Clip
- Sole Plate Assembly
- Sole Plate Anchor Embedments

The sole plate assembly consists of 2" thick plate that is held to the concrete surface with 1" diameter rod anchor embedments. In addition, seismic hold down restraints are welded to the sole plate to prevent overturning of the new Gantry Crane when not tied down to the counterweight box. The crane rail is attached to the sole plate assembly using Gantrex Weldlok 43 Rail Clips. The Gantrex MK6 Rail Pad is placed between the rail and sole plate assembly.

Drawings DMD400583-AA, DMD400584-AA and DMD400588-AA (see Attachment 2), show details of the crane rail system.

Question 5:

Attachment 5 includes the method of analysis of the anchorage system. It states that the required weight of the steel counterweight box was determined by treating the box as a foundation, which provides gravity weight resistance for both operating-basis earthquake and safe-shutdown earthquake loading. Provide the weight of the steel counterweight box.

Question 5 Response:

$W_e = \text{Empty Weight of Box} = 67.1^{\text{K}}$ (Assumes Steel Density = $.49^{\text{K/ft}^3}$)

$W_T = \text{Total Weight of Box with Filler Plates} = 374.4^{\text{K}}$ (Assumes Steel Density = $.49^{\text{K/ft}^3}$)

Question 6:

In Attachment 4, it states that the crane is installed on new rails connected to a new foundation forming part of the reconstructed truck bay floor in the fuel storage building. Is this new foundation the same as the foundation (steel counterweight box) mentioned above? If not, provide the drawing that shows the relationship among the crane, rails, new foundation, and the structural members that support the new foundation.

Question 6 Response:

The new floor system in the Fuel Storage Building consists of three primary components as follows:

1. North Wall Structure Founded On Bedrock

This wall is located on the north side of the new floor area and runs in the east west direction. This wall is approximately 5' wide x 22' tall x 27' long and is doveled into the 2 foot thick structural floor at the top of the wall. The wall's primary function is to support and transfer all bearing loads from the north rail of the crane directly to bedrock. Its secondary function is to provide sufficient ballast to resist uplift forces on the north rail of the crane due to seismic events.

2. Ballast Box Foundation

The ballast box foundation consists of a 2 foot thick reinforced concrete slab founded on bedrock. It is located in the southwest corner of the new floor slab. Its primary function is to transmit all bearing loads from the weight of the counterweight box directly to the underlying bedrock.

3. Structural Slab

The structural slab portion of the new floor system consists of a 2 foot thick reinforced concrete slab founded either directly on bedrock, or, founded on lean concrete fill poured to bedrock. The slab generally extends between the north wall and counterweight box with a small cantilevered section that extends northward beyond the north wall. The primary function of the structural slab is to support the Low Profile Transportation system, Holtec Casks, and the south rail of the gantry crane east of the counterweight box.

Drawings DMD400583-AA, DMD400584-AA and DMD400585-AA (see Attachment 2) which provide foundation/slab details.

Question 7:

In Attachment 4, it also states that restraining lugs and anchors are provided to withstand the calculated uplift forces. Provide drawings that show the lugs and anchors and their surrounding material(s), and describe the methods and procedures on how the restraining forces were calculated.

Question 7 Response:

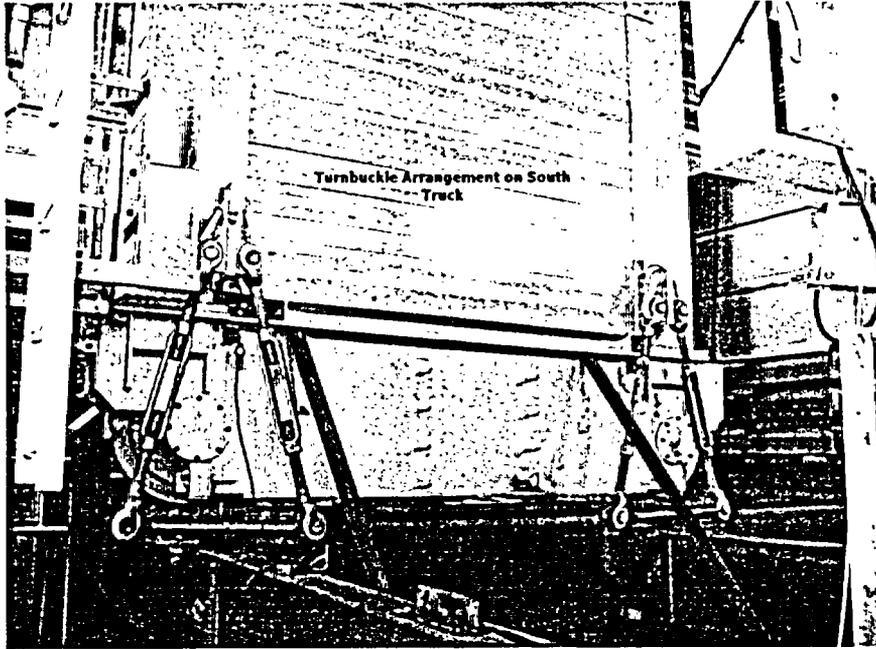
The maximum uplift force occurs with the trolley at the north end of the cantilever while holding on to the fully loaded HI-TRAC and MPC-32. These forces were calculated using the response spectrum method of analysis. The maximum value of the uplift force is 254^k and occurs along the south rail. This uplift force is the result of the load case DL+SSE+LL where:

DL = Dead Load
SSE = Safe Shutdown Earthquake
LL = Weight of fully Loaded HI-TRAC and MPC-32
Position = Trolley at north end of cantilever and Crane Tied down

The total uplift force of 254^k is distributed between the two south legs as follows:

Southwest Leg = 134^k
Southeast Leg = 120^k

These maximum uplift forces are resisted by a large steel counterweight box placed beneath the southwest corner of the new truck bay floor. Turnbuckles transfer the uplift from the crane truck attachments to the attachments on the steel counterweight box. Section A-A of DMD400587-AA (See attachment 2), shows the 2-1/2" center plate to which forces the turnbuckles attach to the counterweight box. Ederer drawing D-43489, sheet 2 of 4, (See Attachment 3), shows the turnbuckle arrangement on the south side of the crane.



Loads and stresses in the counterweight box were calculated by performing a detailed finite element stress analysis using ANSYS. Also, the entire box, including center plate support, was load tested up to approximately 399 kips.

The second primary crane support to prevent uplift/overturning forces are the tie down supports. These supports are welded to the crane sole plates along the entire length of the north rail system and prevent the crane from overturning while moving in the east-west direction along the crane rails. The tie down supports are fabricated from solid 4" bar stock and machined into an angle shape. These supports mate with similar supports on the crane north truck to provide uplift restraint. This supporting system provides the uplift restraint when the crane is not attached to the counterweight box. Drawing DMD400588-AA (See Attachment 2), contains the details of these seismic tie down supports.

Question 8:

In Attachment 5, it states that the steel counterweight box is embedded below the floor to resist the uplift forces. Provide the magnitude of the maximum uplift force at the location of the steel counterweight box resulting from all applicable loading combinations, and identify the loading combination. Provide the punching shear stress and punching shear strength(capacity) in the floor resulting from the maximum uplift force.

Question 8 Response:

The maximum uplift force occurs with the trolley at the north end of the cantilever while holding on to the fully loaded HI-TRAC and MPC-32. These forces were calculated using the response spectrum method of analysis. The maximum value of the uplift force is 254^k and occurs along the south rail. This uplift force is the result of the load case DL+SSE+LL where:

DL = Dead Load
SSE = Safe Shutdown Earthquake
LL = Weight of fully Loaded HI-TRAC and MPC-32
Position = Trolley at north end of cantilever and Crane Tied down

The total uplift force of 254^k is distributed between the two south legs as follows:

Southwest Leg = 134^k
Southeast Leg = 120^k

All elements of the new floor system in the Fuel Storage Building are either founded on bedrock, or, are founded on a lean concrete fill that is founded on bedrock. This provides a rigid base for the floor elements. As a result, the punching shear effect was not considered applicable.

Question 9:

In Attachment 5, it states that turnbuckles are used as tie-downs. Provide the maximum stress in the turnbuckles for all applicable loading combinations and the allowable stress for the turnbuckles.

Question 9 Response:

The maximum axial load in any turnbuckle occurs in the turnbuckles located along the south rail and is equal to 177.7^k. These turnbuckles are 2-1/4" Crosby Eye & Eye Turnbuckles with the following capacities:

SWL = Safe Working Load = 75^k
PL = Proof Load = 187.5^k
UL = Ultimate Load = 375^k

Since the maximum load in the turnbuckles occurs as a result of a faulted condition (SSE loads), use of the Proof Load as an allowable load is appropriate. Since the maximum load is less than the Proof Load, the turnbuckles will remain elastic even under the worst case loading conditions.

ATTACHMENT 2 TO NL-05-030

ADDITIONAL INFORMATION REGARDING PROPOSED LICENSE
AMENDMENT REQUEST FOR NEW FUEL STORAGE
BUILDING GANTRY CRANE AT INDIAN POINT 2

Entergy Design Drawings

Item 1.	DMD 400583-AA	Foundation/Slab Details
Item 2.	DMD 400584-AA	Foundation/Slab Details
Item 3.	DMD 400585-AA	Foundation/Slab Details
Item 4.	DMD 400587-AA	Foundation/Slab Details
Item 5.	DMD 400588-AA	Foundation/Slab Details

ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNIT 2
DOCKET 50-247

ATTACHMENT 3 TO NL-05-030

ADDITIONAL INFORMATION REGARDING PROPOSED LICENSE

AMENDMENT REQUEST FOR NEW FUEL STORAGE

BUILDING GANTRY CRANE AT INDIAN POINT 2

(with Proprietary Information)

Ederer Design Drawings

- | | | |
|---------|---------|-----------------------------|
| Item 1. | PA-2389 | General Arrangement Drawing |
| Item 2. | D-43489 | Turnbuckle Arrangement |

ENCLOSURE A TO NL-05-030

**Ederer Application for Withholding Proprietary Information from Public
Disclosure dated April 1, 2005 (F2725T43) with the accompanying affidavit**

ENTERGY NUCLEAR OPERATIONS, INC
INDIAN POINT NUCLEAR GENERATING UNIT 2
DOCKET 50-247



1 April 2005

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

APPLICATION FOR WITHHOLDING PROPRIETARY INFORMATION FROM
PUBLIC DISCLOSURE

Subject: Reply to NRC Request for Additional Information regarding proposed license amendment request for new fuel storage building gantry crane at Indian Point 2 in NL-05-030

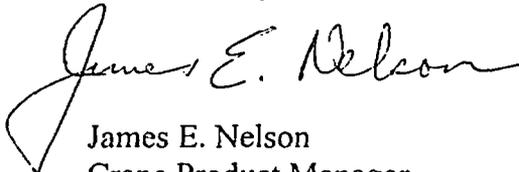
Our Ref: F2725T43

The proprietary information for which withholding is being requested in the above-referenced document is further identified in AFFIDAVIT PURSUANT TO 10 CFR 2.790 signed by the owner of the proprietary information, PaR Nuclear, Inc. The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b) 4 of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Entergy Nuclear Operations.

Correspondence with respect to the proprietary aspects of the application for withholding or the PaR Nuclear affidavit should reference this letter, F2725T43, and should be addressed to James E. Nelson, Crane Product Manager, PaR Nuclear, Inc., P.O. Box 24708, Seattle, WA 98124-0708.

Very truly yours,
PaR Nuclear, Inc.



James E. Nelson
Crane Product Manager

AFFIDAVIT PURSUANT TO 10 CFR 2.790
Affidavit No. F2725T43

I, James E. Nelson, depose and say that I am the Crane Product Manager of the Ederer Nuclear Crane Division of PaR Nuclear, Inc. (PaR Nuclear), duly authorized to make this affidavit, and have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in the following documents:

Ederer, LLC Drawing number PA-2389 and Ederer, LLC Drawing number D-43849, sheet 2 of 4.

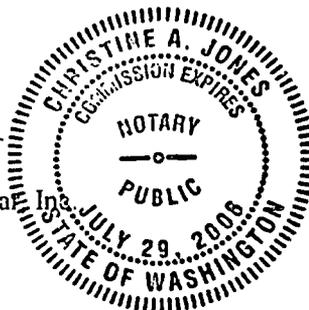
The information on the referenced drawings has been appropriately designated as proprietary.

I have personal knowledge of the criteria used by PaR Nuclear in designating information as a trade secret, privileged, or as confidential commercial or financial information. Pursuant to the provisions of 10 CFR 2.790(b)(4) of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced documents, should be withheld.

1. The information sought to be withheld from public disclosure is owned and has been held in confidence by PaR Nuclear. It consists of specific and unique design details and apparatus for meeting the operational and dimensional constraints of a facility while incorporating certain NRC safety guidelines. This information is of important competitive commercial value.
2. The information is of a type customarily held in confidence by PaR Nuclear and not customarily disclosed to the public. PaR Nuclear has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence.
3. The information, to the best of my knowledge and belief, has consistently been held in confidence by PaR Nuclear, no public disclosure has been made, and it is not available in public sources. Any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
4. Public disclosure of the information is likely to cause substantial harm to the competitive position of PaR Nuclear because:
 - a. Cranes for the same purposes in nuclear plants, with similar design features except for the particularly advantageous features depicted in the subject documents, are offered by several competitors.
 - b. Development of the apparatus described in the information cost PaR Nuclear hundreds of thousands of dollars and many thousands of man-hours of effort. A competitor would have to undertake a similar effort to develop an equivalent system without the information.
 - c. The availability of the information to competitors would enable them to modify their products to better compete with PaR Nuclear, to take marketing actions to improve their products' position or impair the position of PaR Nuclear's product.
 - d. Use of the information by competitors in the international marketplace would increase their ability to compete with PaR Nuclear for similar applications and have an adverse economic impact on PaR Nuclear's ability to obtain and maintain foreign licenses.

End of my deposition.


James E. Nelson
Crane Product Manager, PaR Nuclear, Inc.



Sworn to before me this 4th day of
April, 2005


Christine Jones
Notary Public

My commission expires 7-29-08

**THIS PAGE IS AN
OVERSIZED DRAWING OR
FIGURE,**

**THAT CAN BE VIEWED AT THE
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**DRAWING NO. DMD400583-AA,
“FUEL STORAGE BUILDING ISFSI
MODIFICATION**

TRUCK BAY SLAB PLAN”,

REV. 02

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DMD400583-AA, REV. 02**

D-01

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**DRAWING NO. DMD400584-AA,
“FUEL STORAGE BUILDING ISFSI
MODIFICATION
TRUCK BAY SLAB SECTIONS”,
REV. 02**

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DMD400584-AA, REV. 02**

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“FUEL STORAGE BUILDING ISFSI
MODIFICATION
TRUCK BAY SLAB SECTIONS AND
DETAILS”,
REV. 02**

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“FUEL STORAGE BUILDING ISFSI
MODIFICATION
COUNTERWEIGHT DETAILS”,
REV. 01**

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DMD400587-AA, REV. 01**

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“FUEL STORAGE BUILDING ISFSI
MODIFICATION
SOLE PLATE DETAILS”,
REV. 02**

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DMD400588-AA, REV. 02**

D-05

PROPRIETARY

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DRAWING NO. D-43849,
"GANTRY ASSEMBLY",
REV. A**

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DOCUMENT/REPORT NO.
D43849, REV. A**

D-06

PROPRIETARY

**THIS PAGE IS AN
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FIGURE,**

**THAT CAN BE VIEWED AT THE
RECORD TITLED:**

**“DESIGN COORDINATION DRAWING
UNIT 2**

IPEC UNIT 2 (OPTION FOR UNIT 3)

110 TON TRAVELING X-SAM SFP

GANTRY

ENTERGY NUCLEAR NORTHEAST”

WITHIN THIS PACKAGE

D-07