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Reference: 1. USNRC Docket No. 72-1014 (HI-STORM 100), TAC L23850
2. Holtec Project 5014
3. Holtec Letter 5014626 dated 15 June 2007

Subject: License Amendment Request (LAR) #3 to HI-STORM 100 CoC

Dear Sir:

We had previously (Reference 3) submitted a revision to LAR #3 that addressed short-term operations as discussed with and agreed to by NRC. Subsequent communications to clarify information in our June 15th submittal led to the receipt of a few editorial comments from the SFST Staff. We herein submit a revision to LAR #3 to incorporate the Staff's editorial comments. Because only minor changes and clarifications were requested, only replacement sections are provided. The items attached to this letter consist of the following:

- CoC Appendix A, LCO 3.1.1, Pages 3.1.1-1 through 3.1.1-4
- CoC Appendix A, LCO 3.1.4, Pages 3.1.4-1 and 3.4-1
- FSAR Section 4.5, Pages 4.5-1 through 4.5-17
- FSAR Section 8.1, Pages 8.1-1 through 8.1-42

Please contact us if you have any questions.

Sincerely,

Evan Rosenbaum, P.E.
Project Manager, LAR 1014-3

cc: Mr. Christopher Regan, NRC
Dr. Edwin Hackett, NRC
Mr. Bill Brach, NRC
Group 1, Holtec

Attachment: LAR 1014-3, Rev. 3.L, 65 Pages
Document ID: 5014629

NMSS01

NMSS

3.1 SFSC INTEGRITY

3.1.1 Multi-Purpose Canister (MPC)

LCO 3.1.1 The MPC shall be dry and helium filled.

Table 3-1 provides decay heat and burnup limits for forced helium dehydration (FHD) and vacuum drying. FHD is not subject to time limits. Vacuum drying is subject to the following time limits, from the end of bulk water removal until the start of helium backfill:

MPC Total Decay Heat (Q)	Vacuum Drying Time Limit
$Q \leq 23 \text{ kW}$	None
$23 \text{ kW} < Q \leq 28.74 \text{ kW}$	40 hours
$Q > 28.74 \text{ kW}$	Not Permitted (see Table 3-1)

APPLICABILITY: During TRANSPORT OPERATIONS and STORAGE OPERATIONS.

ACTIONS

-----NOTE-----

Separate Condition entry is allowed for each MPC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. MPC cavity vacuum drying pressure or demoisurizer exit gas temperature limit not met.	A.1 Perform an engineering evaluation to determine the quantity of moisture left in the MPC.	7 days
	<u>AND</u> A.2 Develop and initiate corrective actions necessary to return the MPC to compliance with Table 3-1 in an analyzed condition.	30 days

ACTIONS
(continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. MPC cavity vacuum drying pressure limit not met.	B.1 Backfill the MPC cavity with helium to a pressure of at least 0.5 atm.	6 hours
BC. MPC helium backfill limit not met.	<p>BC.1 Perform an engineering evaluation to determine the impact of helium differential.</p> <p><u>AND</u></p> <p>BC.2.1 Develop and initiate corrective actions necessary to return the MPC to an analyzed condition by adding helium to or removing helium from the MPC.</p> <p><u>OR</u></p> <p>C.2.2 Develop and initiate corrective actions necessary to demonstrate through analysis, using the models and methods from the HI-STORM FSAR, that all limits for cask components and contents will be met.</p>	<p>72 hours</p> <p>14 days</p> <p>14 days</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.1.1	Verify that the MPC cavity has been dried in accordance with the applicable limits in Table 3-1, within the specified vacuum drying time limits as applicable.	Once, prior to TRANSPORT OPERATIONS
SR 3.1.1.2	Verify MPC helium backfill quantity is within the limit specified in Table 3-2 for the applicable MPC model. Re-performance of this surveillance is not required upon successful completion of Action B.2.2.	Once, prior to TRANSPORT OPERATIONS
SR 3.1.1.3	Verify that the helium leak rate through the MPC vent and drain port confinement welds meets the leaktight criteria of ANSI N14.5-1997.	Once, prior to TRANSPORT OPERATIONS

3.1 SFSC INTEGRITY

3.1.4 Supplemental Cooling System

LCO 3.1.4 The Supplemental Cooling System (SCS) shall be operable

-----NOTE-----

Upon reaching steady state operation, the SCS may be temporarily disabled for a short duration (≤ 7 hours) to facilitate necessary operational evolutions, such as movement of the TRANSFER CASK through a door way, or other similar operation.

APPLICABILITY: This LCO is applicable when the loaded MPC is in the TRANSFER CASK and:

- a. Within 4 hours of the completion of MPC drying operations in accordance with LCO 3.1.1 or within 4 hours of transferring the MPC into the TRANSFER CASK if the MPC is to be unloaded

AND

- b1. The MPC contains one or more fuel assemblies with an average burnup $> 45,000$ MWD/MTU

OR

- b2. The MPC decay heat load exceeds 28.74 kW.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. SFSC Supplemental Cooling System inoperable.	A.1 Restore SFSC Supplemental Cooling System to operable status.	7 days
B. Required Action A.1 and associated Completion Time not met.	B.1 Remove all fuel assemblies from the SFSC.	30 days

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.4.1	Verify Supplemental Cooling System is operable.	2 hours

4.5 THERMAL EVALUATION OF SHORT TERM OPERATIONS

Prior to placement in a HI-STORM overpack, an MPC must be loaded with fuel, outfitted with closures, dewatered, dried, backfilled with helium and transported to the HI-STORM module. In the unlikely event that the fuel needs to be returned to the spent fuel pool, these steps must be performed in reverse. Finally, if required, transfer of a loaded MPC between HI-STORM overpacks or between a HI-STAR transport overpack and a HI-STORM storage overpack must be carried out in an assuredly safe manner. All of the above operations, henceforth referred to as "short term operations", are short duration events that would likely occur no more than once or twice for an individual MPC.

The device central to all of the above operations is the HI-TRAC transfer cask that, as stated in Chapter 1, is available in two anatomically similar weight ratings (100- and 125-ton). The HI-TRAC transfer cask is a short-term host for the MPC; therefore it is necessary to establish that, during all thermally challenging operation events involving either the 100-ton or 125-ton HI-TRAC, the permissible temperature limits presented in Section 4.3 are not exceeded. The following discrete thermal scenarios, all of short duration, involving the HI-TRAC transfer cask have been identified as warranting thermal analysis.

- i. Post-Loading Wet Transfer Operations*
- ii. MPC Cavity Vacuum Drying*
- iii. Normal Onsite Transport in a Vertical Orientation*
- iv. MPC Cooldown and Reflood for Unloading Operations*

Onsite transport of the MPC occurs with the HI-TRAC in the vertical orientation, which preserves the thermosiphon action within the MPC. To avoid excessive temperatures, transport with the HI-TRAC in the horizontal condition is generally not permitted. However, it is recognized that an occasional downending of a HI-TRAC may become necessary to clear an obstruction such as a low egress bay door opening. In such a case the operational imperative for HI-TRAC downending must be ascertained and the permissible duration of horizontal configuration must be established on a site-specific basis and compliance with the thermal limits of ISG-11 [4.1.4] must be demonstrated as a part of the site-specific safety evaluation.

The fuel handling operations listed above place a certain level of constraint on the dissipation of heat from the MPC relative to the normal storage condition. Consequently, for some scenarios, it is necessary to provide additional cooling when decay heat loads are such that long-term cladding temperature limits would be exceeded. For such situations, the Supplemental Cooling System (SCS) is required to provide additional cooling during short term operations. The SCS is required by the CoC for any MPC carrying one or more high burnup fuel assemblies or when the MPC heat load is such that long-term cladding temperature limits would be exceeded. The specific design of an SCS must accord with site-specific needs and resources, including the availability of plant utilities. However, a set of specifications to ensure that the performance objectives of the SCS are satisfied by plant-specific designs are set forth in Appendix 2.C.

4.5.1 HI-TRAC Thermal Model

The HI-TRAC transfer cask is used to load and unload the HI-STORM concrete storage overpack, including onsite transport of the MPCs from the loading facility to an ISFSI pad. Section views of the HI-TRAC have been presented in Chapter 1. Within a loaded HI-TRAC, heat generated in the MPC is transported from the contained fuel assemblies to the MPC shell *through the fuel basket and the basket-to-shell gaps via conduction and thermal radiation* ~~in the manner described in Section 4.4~~. From the outer surface of the MPC to the ambient air, heat is transported by a combination of conduction, thermal radiation and natural convection. Analytical modeling details of all the various thermal transport mechanisms are provided in the following subsection.

Two HI-TRAC transfer cask designs, namely, the 125-ton and the 100-ton versions, are developed for onsite handling and transport, as discussed in Chapter 1. The two designs are principally different in terms of lead thickness and the thickness of radial connectors in the water jacket region. The analytical model developed for HI-TRAC thermal characterization conservatively accounts for these differences by applying the higher shell thickness and thinner radial connectors' thickness to the model. In this manner, the HI-TRAC overpack resistance to heat transfer is overestimated, resulting in higher predicted MPC internals and fuel cladding temperature levels.

4.5.1.1 Analytical Model

From the outer surface of the MPC to the ambient atmosphere, heat is transported within HI-TRAC through multiple concentric layers of air, steel and shielding materials. Heat must be transported across a total of six concentric layers, representing the air gap, the HI-TRAC inner shell, the lead shielding, the HI-TRAC outer shell, the water jacket and the enclosure shell. From the surface of the enclosure shell heat is rejected to the atmosphere by natural convection and radiation.

A small diametral air gap exists between the outer surface of the MPC and the inner surface of the HI-TRAC overpack. Heat is transported across this gap by the parallel mechanisms of conduction and thermal radiation. Assuming that the MPC is centered and does not contact the transfer overpack walls conservatively minimizes heat transport across this gap. Additionally, thermal expansion that would minimize the gap is conservatively neglected. Heat is transported through the cylindrical wall of the HI-TRAC transfer overpack by conduction through successive layers of steel, lead and steel. A water jacket, which provides neutron shielding for the HI-TRAC overpack, surrounds the cylindrical steel wall. The water jacket is composed of carbon steel channels with welded, connecting enclosure plates. Conduction heat transfer occurs through both the water cavities and the channels. While the water jacket channels are sufficiently large for natural convection loops to form, this mechanism is conservatively neglected. Heat is passively rejected to the ambient from the outer surface of the HI-TRAC transfer overpack by natural convection and thermal radiation.

In the vertical position, the bottom face of the HI-TRAC is in contact with a supporting surface. This face is conservatively modeled as an insulated surface. Because the HI-TRAC is not used for long-

term storage in an array, radiative blocking does not need to be considered. The HI-TRAC top lid is modeled as a surface with convection, radiative heat exchange with air and a constant maximum incident solar heat flux load. Insulation on cylindrical surfaces is conservatively based on 12-hour levels prescribed in 10CFR71 averaged on a 24-hour basis. Concise descriptions of these models are given below.

4.5.1.1.1 Effective Thermal Conductivity of Water Jacket

The 125-ton HI-TRAC water jacket is composed of an array of radial ribs equispaced along the circumference of the HI-TRAC and welded along their length to the HI-TRAC outer shell. Enclosure plates are welded to these ribs, creating an array of water compartments. The 100-ton HI-TRAC water jacket also has an array of radial ribs and enclosure plates creating an array of water compartments. Holes in the radial ribs connect all the individual compartments in the water jacket. Any combination of rib number and thickness that yields an equal or larger heat transfer area is bounded by the calculation. Thus, the annular region between the HI-TRAC outer shell and the enclosure shell can be considered as an array of steel ribs and water spaces.

The effective radial thermal conductivity of this array of steel ribs and water spaces is determined by combining the heat transfer resistance of individual components in a parallel network. A bounding calculation is assured by using the minimum number of ribs and rib thickness as input values. The thermal conductivity of the parallel steel ribs and water spaces is given by the following formula:

$$K_{ne} = \frac{K_r N_r t_r \ln\left(\frac{r_o}{r_i}\right)}{2\pi L_R} + \frac{K_w N_r t_w \ln\left(\frac{r_o}{r_i}\right)}{2\pi L_R}$$

where:

- K_{ne} = effective radial thermal conductivity of water jacket
- r_i = inner radius of water spaces
- r_o = outer radius of water spaces
- K_r = thermal conductivity of carbon steel ribs
- N_r = minimum number of radial ribs (equal to number of water spaces)
- t_r = minimum (nominal) rib thickness (lower of 125-ton and 100-ton designs)
- L_R = effective radial heat transport length through water spaces
- K_w = thermal conductivity of water
- t_w = water space width (between two carbon steel ribs)

Figure 4.5.1 depicts the resistance network to combine the resistances to determine an effective conductivity of the water jacket. The effective thermal conductivity is computed in the manner of the foregoing, and is provided in Table 4.5.1.

4.5.1.1.2 Heat Rejection from Overpack Exterior Surfaces

The following relationship for the surface heat flux from the outer surface of an isolated cask to the environment is applied to the thermal model:

$$q_s = 0.19 (T_s - T_A)^{4/3} + 0.1714\varepsilon \left[\left(\frac{T_s + 460}{100} \right)^4 - \left(\frac{T_A + 460}{100} \right)^4 \right]$$

where:

T_s = cask surface temperatures (°F)

T_A = ambient atmospheric temperature (°F)

q_s = surface heat flux (Btu/ft²×hr)

ε = surface emissivity

The second term in this equation is the Stefan-Boltzmann formula for thermal radiation from an exposed surface to ambient. The first term is the natural convection heat transfer correlation recommended by Jacob and Hawkins [4.2.9]. This correlation is appropriate for turbulent natural convection from vertical surfaces, such as the vertical overpack wall. Although the ambient air is conservatively assumed to be quiescent, the natural convection is nevertheless turbulent.

Turbulent natural convection correlations are suitable for use when the product of the Grashof and Prandtl ($Gr \times Pr$) numbers exceeds 10^9 . This product can be expressed as $L^3 \times \Delta T \times Z$, where L is the characteristic length, ΔT is the surface-to-ambient temperature difference, and Z is a function of the surface temperature. The characteristic length of a vertically oriented HI-TRAC is its height of approximately 17 feet. The value of Z , conservatively taken at a surface temperature of 340°F, is 2.6×10^5 . Solving for the value of ΔT that satisfies the equivalence $L^3 \times \Delta T \times Z = 10^9$ yields $\Delta T = 0.78^\circ\text{F}$. For a horizontally oriented HI-TRAC the characteristic length is the diameter of approximately 7.6 feet (minimum of 100- and 125-ton designs), yielding $\Delta T = 8.76^\circ\text{F}$. The natural convection will be turbulent, therefore, provided the surface to air temperature difference is greater than or equal to 0.78°F for a vertical orientation and 8.76°F for a horizontal orientation.

4.5.1.1.3 Determination of Solar Heat Input

~~As discussed in Section 4.4.1.1.8,~~ The intensity of solar radiation incident on an exposed surface depends on a number of time varying terms. A twelve-hour averaged insolation level is prescribed in 10CFR71 for curved surfaces. The HI-TRAC cask, however, possesses a considerable thermal inertia. This large thermal inertia precludes the HI-TRAC from reaching a steady-state thermal condition during a twelve-hour period. Thus, it is considered appropriate to use the 24-hour averaged insolation level.

4.5.2 Maximum Time Limit During Wet Transfer Operations

In accordance with NUREG-1536, water inside the MPC cavity during wet transfer operations is not permitted to boil. Consequently, uncontrolled pressures in the de-watering, purging, and recharging system that may result from two-phase conditions are completely avoided. This requirement is accomplished by imposing a limit on the maximum allowable time duration for fuel to be submerged in water after a loaded HI-TRAC cask is removed from the pool and prior to the start of vacuum drying operations.

Fuel loading operations are typically conducted with the HI-TRAC and its contents (water filled MPC) submerged in pool water. Under these conditions, the HI-TRAC is essentially at the pool water temperature. When the HI-TRAC transfer cask and the loaded MPC under water-flooded conditions is removed from the pool, the water, fuel, MPC and HI-TRAC metal absorb the decay heat emitted by the fuel assemblies. This results in a slow temperature rise of the HI-TRAC with time, starting from an initial (pool water) temperature. The rate of temperature rise is limited by the thermal inertia of the HI-TRAC system. To enable a bounding heat-up rate determination, the following conservative assumptions are utilized:

- i. Heat loss by natural convection and radiation from the exposed HI-TRAC surfaces to ambient air is neglected (i.e., an adiabatic heat-up calculation is performed).
- ii. Design maximum decay heat input from the loaded fuel assemblies is assumed.
- iii. The smaller of the two (i.e., 100-ton and 125-ton) HI-TRAC transfer cask designs is credited in the analysis. The 100-ton design has a significantly smaller quantity of metal mass, which will result in a higher rate of temperature rise.
- iv. The water mass in the MPC cavity is understated.

Table 4.5.2 summarizes the weights and thermal inertias of several components in the loaded HI-TRAC transfer cask. The rate of temperature rise of the HI-TRAC transfer cask and contents during an adiabatic heat-up is governed by the following equation:

$$\frac{dT}{dt} = \frac{Q}{C_h}$$

where:

- Q = conservatively bounding heat load (Btu/hr) [38 kW = 1.3×10^5 Btu/hr]
 C_h = thermal inertia of a loaded HI-TRAC (Btu/°F)
 T = temperature of the HI-TRAC cask (°F)
 t = time after HI-TRAC transfer cask is removed from the pool (hr)

A bounding heat-up rate for the HI-TRAC transfer cask contents is determined to be equal to 4.99°F/hr. From this adiabatic rate of temperature rise estimate, the maximum allowable time duration (t_{max}) for fuel to be submerged in water is determined as follows:

$$t_{max} = \frac{T_{boil} - T_{initial}}{(dT/dt)}$$

where:

T_{boil} = boiling temperature of water (equal to 212°F at the water surface in the MPC cavity)

$T_{initial}$ = initial HI-TRAC temperature when the transfer cask is removed from the pool

Table 4.5.3 provides a summary of t_{max} at several representative initial temperatures.

As set forth in the HI-STORM operating procedures, in the unlikely event that the maximum allowable time provided in Table 4.5.3 is found to be insufficient to complete all wet transfer operations, a forced water circulation shall be initiated and maintained to remove the decay heat from the MPC cavity. In this case, relatively cooler water will enter via the MPC lid drain port connection and heated water will exit from the vent port. The minimum water flow rate required to maintain the MPC cavity water temperature below boiling with an adequate subcooling margin is determined as follows:

$$M_w = \frac{Q}{C_{pw} (T_{max} - T_{in})}$$

where:

M_w = minimum water flow rate (lb/hr)

C_{pw} = water heat capacity (Btu/lb-°F)

T_{max} = maximum MPC cavity water mass temperature

T_{in} = temperature of pool water supply to MPC

With the MPC cavity water temperature limited to 150°F, MPC inlet water maximum temperature equal to 125°F and at the design basis maximum heat load, the water flow rate is determined to be 5210 lb/hr (10.5 gpm).

4.5.3 MPC Temperatures During Moisture Removal Operations

4.5.3.1 Vacuum Drying Operation

The initial loading of SNF in the MPC requires that the water within the MPC be drained and replaced with helium. For MPCs containing moderate burnup fuel assemblies only, this operation may be carried out using the conventional vacuum drying approach. In this method, removal of the last traces of residual moisture from the MPC cavity is accomplished by evacuating the MPC for a short time after draining the MPC. Vacuum drying may not be performed on MPCs containing high burnup fuel assemblies or on MPCs with a decay heat load above a threshold level (see Subsection

4.5.5.2). High burnup or high decay heat fuel drying is performed by a forced flow helium drying process as described in Section 4.5.3.2-1.4.2 and Appendix 2.B.

Prior to the start of the MPC draining operation, both the HI-TRAC annulus and the MPC are full of water. The presence of water in the MPC ensures that the fuel cladding temperatures are lower than design basis limits by large margins. As the heat generating active fuel length is uncovered during the draining operation, the fuel and basket mass will undergo a gradual heat up from the initially cold conditions when the heated surfaces were submerged under water.

The vacuum condition effective fuel assembly conductivity is determined by procedures discussed earlier (Subsection 4.4.1.1.2) after setting the thermal conductivity of the gaseous medium to a small fraction (one part in one thousand) of helium conductivity. The MPC basket cross sectional effective conductivity is determined for vacuum conditions using a finite-element according to the procedure discussed in 4.4.1.1.4. Basket periphery-to-MPC shell heat transfer occurs through conduction and radiation.

For total decay heat loads up to and including 20.88 kW for the MPC-24 and 21.52 kW for the MPC-68, vacuum drying of the MPC is performed with the annular gap between the MPC and the HI-TRAC filled with water. The presence of water in this annular gap will maintain the MPC shell temperature approximately equal to the saturation temperature of the annulus water. Thus, the thermal analysis of the MPC during vacuum drying for these conditions is performed with cooling of the MPC shell with water at a bounding maximum temperature of 232°F.

For higher total decay heat loads in the MPC-24 and MPC-68 or for any decay heat load in an MPC-24E or MPC-32, vacuum drying of the MPC is performed with the annular gap between the MPC and the HI-TRAC continuously flushed with water. The water movement in this annular gap will maintain the MPC shell temperature at about the temperature of flowing water. Thus, the thermal analysis of the MPC during vacuum drying for these conditions is performed with cooling of the MPC shell with water at a bounding maximum temperature of 125°F.

In addition, for MPC total decay heat loads greater than 23 kW, the duration of vacuum drying is limited to 40 hours. Imposing this time limit provides additional assurance, to account for uncertainty of 2-D models, that fuel cladding and cask component temperatures will remain below applicable limits.

An axisymmetric FLUENT thermal model of the MPC is constructed, employing the MPC in-plane conductivity as an isotropic fuel basket conductivity (i.e. conductivity in the basket radial and axial directions is equal), to determine peak cladding temperature at design basis heat loads. To avoid excessive conservatism in the computed FLUENT solution, partial recognition for higher axial heat dissipation is adopted in the peak cladding calculations. The boundary conditions applied to this evaluation are:

- i. A bounding steady-state analysis is performed with the MPC decay heat load set equal to the largest ~~design basis~~ decay heat load *for which vacuum drying is permitted (see Subsection 4.5.5.2)*. As discussed above, there are two different ranges for the MPC-24 and MPC-68 designs.
- ii. The entire outer surface of the MPC shell is postulated to be at a bounding maximum temperature of 232°F or 125°F, as discussed above.
- iii. The top and bottom surfaces of the MPC are adiabatic.

Results of vacuum condition analyses are provided in Subsection 4.5.25.2.

4.5.3.2 Forced Helium Dehydration

To reduce moisture to trace levels in the MPC using a Forced Helium Dehydration (FHD) system, a conventional, closed loop dehumidification system consisting of a condenser, a demister, a compressor, and a pre-heater is utilized to extract moisture from the MPC cavity through repeated displacement of its contained helium, accompanied by vigorous flow turbulence. A vapor pressure of 3 torr or less is assured by verifying that the helium temperature exiting the demister is maintained at or below the psychrometric threshold of 21°F for a minimum of 30 minutes. See Appendix 2.B for detailed discussion of the design criteria and operation of the FHD system.

The FHD system provides concurrent fuel cooling during the moisture removal process through forced convective heat transfer. The attendant forced convection-aided heat transfer occurring during operation of the FHD system ensures that the fuel cladding temperature will remain below the applicable peak cladding temperature limit for normal conditions of storage, which is well below the high burnup cladding temperature limit 752°F (400°C) for all combinations of SNF type, burnup, decay heat, and cooling time. Because the FHD operation induces a state of forced convection heat transfer in the MPC, (in contrast to the quiescent mode of natural convection in long term storage), it is readily concluded that the peak fuel cladding temperature under the latter condition will be greater than that during the FHD operation phase. In the event that the FHD system malfunctions, the forced convection state will degenerate to natural convection, which corresponds to the conditions of normal onsite transport. As a result, the peak fuel cladding temperatures will approximate the values reached during normal onsite transport as described elsewhere in this chapter.

4.5.4 Cask Cooldown and Reflood Analysis During Fuel Unloading Operation

NUREG-1536 requires an evaluation of cask cooldown and reflooding to support fuel unloading from a dry condition. Past industry experience generally supports cooldown of cask internals and fuel from hot storage conditions by direct water quenching. For high heat load MPCs, the extremely rapid cooldown rates to which the hot MPC internals and the fuel cladding can be subjected during water injection may, however, result in high thermal stresses. Additionally, water injection may also result in some steam generation. To limit the fuel cladding from thermal strains from direct water

quenching, the MPCs may be cooled using appropriate means prior to the introduction of water in the MPC cavity space.

Because of the continuous gravity driven circulation of helium in the MPC which results in heated helium gas in sweeping contact with the underside of the top lid and the inner cylindrical surface of the enclosure vessel, utilizing an external cooling means to remove heat from the MPC is quite effective. The external cooling process can be completely non-intrusive such as extracting heat from the outer surface of the enclosure vessel using chilled water. Extraction of heat from the external surfaces of an MPC is very effective largely because of the thermosiphon induced internal transport of heat to the peripheral regions of the MPC. The non-intrusive means of heat removal is preferable to an intrusive process wherein helium is extracted and cooled using a closed loop system such as a Forced Helium Dehydrator (Appendix 2.B), because it eliminates the potential for any radioactive crud to exit the MPC during the cooldown process. Because the optimal method for MPC cooldown is heavily dependent on the location and availability of utilities at a particular nuclear plant, mandating a specific cooldown method cannot be prescribed in this FSAR. Simplified calculations are presented in the following to illustrate the feasibility and efficacy of utilizing an intrusive system such as a recirculating helium cooldown system.

Under a closed-loop forced helium circulation condition, the helium gas is cooled, via an external chiller. The chilled helium is then introduced into the MPC cavity from connections at the top of the MPC lid. The helium gas enters the MPC basket and moves through the fuel basket cells, removing heat from the fuel assemblies and MPC internals. The heated helium gas exits the MPC from the lid connection to the helium recirculation and cooling system. Because of the turbulence and mixing of the helium contents in the MPC cavity by the forced circulation, the MPC exiting temperature is a reliable measure of the thermal condition inside the MPC cavity. The objective of the cooldown system is to lower the bulk helium temperature in the MPC cavity to below the normal boiling temperature of water (212°F). For this purpose, the rate of helium circulation shall be sufficient to ensure that the helium exit gas temperature is below this threshold limit with a margin.

An example calculation for the required helium circulation rate is provided below to limit the helium temperature to 200°F. The calculation assumes no heat loss from the MPC boundaries and a conservatively bounding heat load (38 kW (1.3x10⁵ Btu/hr)). Under these assumptions, the MPC helium is heated adiabatically by the MPC decay heat from a given inlet temperature (T₁) to a temperature (T₂). The required circulation rate to limit T₂ to 200°F is computed as follows:

$$m = \frac{Q_d}{C_p(T_2 - T_1)}$$

where:

Q_d = Design maximum decay heat load (Btu/hr)

m = Minimum helium circulation rate (lb/hr)

C_p = Heat capacity of helium (1.24 Btu/lb-°F (Table 4.2.5))

T_1 = Helium supply temperature (assumed 15°F in this example)

Substituting the values for the parameters in the equation above, m is computed as 567 lb/hr.

4.5.5 Mandatory Limits for Short Term Operations

4.5.5.1 HI-TRAC Transport in a Vertical Orientation

The requirements and limits are listed in the following table:

Condition	Fuel in MPC	MPC Heat Load (kW)	SCS Required
1*	All MBF	≤ 28.74	NO
2	All MBF	> 28.74	YES
3	One or more HBF	any	YES

* The highest temperatures are reached under this un-assisted cooling threshold heat load scenario. Under other conditions the mandatory use of the Supplemental Cooling System, sized to extract 36.9 kW from the MPC, will lower the fuel temperatures significantly assuring ISG 11, Rev. 3 compliance with large margins.

Condition 2 mandates the use of the SCS at heat loads greater than 28.74 kW for MBF. This will assure that cladding temperature limits are met at these higher heat loads. See Appendix 2.C for the SCS requirements.

It is recognized that, due to increased thermosiphon action, the temperature in the MPC under 7 atmospheres internal pressure (required in this amendment) will be lower than that for the conservative 5 atmospheres case on which Condition 1 is based. Therefore, there is an additional implicit margin in the fuel cladding temperatures incorporated in the short term operations by the use of the FSAR heat load limits herein.

An axisymmetric FLUENT thermal model of an MPC inside a HI-TRAC transfer cask was developed to evaluate temperature distributions for onsite transport conditions. A bounding steady-state analysis of the HI-TRAC transfer cask has been performed using the hottest MPC, the highest design-basis decay heat load for which SCS is not required (Table 2.1.6), and design-basis insulation levels. While the duration of onsite transport may be short enough to preclude the MPC and HI-TRAC from obtaining a steady-state, a steady-state analysis is conservative. ~~Information listing all other thermal analyses pertaining to the HI-TRAC cask and associated subsection of the FSAR summarizing obtained results is provided in Table 4.5.8.~~

A converged temperature contour plot is provided in Figure 4.5.2. Maximum fuel clad temperatures are listed in Table 4.5.42, which also summarizes maximum calculated temperatures in different parts of the HI-TRAC transfer cask and MPC. As described in Subsection 4.4.4.12, the FLUENT calculated peak temperature in Table 4.5.42 is actually the peak pellet centerline temperature, which bounds the peak cladding temperature. We conservatively assume that the peak clad temperature is equal to the peak pellet centerline temperature.

The maximum computed temperatures listed in Table 4.5.42 are based on the HI-TRAC cask at ~~Design Basis Maximum~~ *the maximum heat load that can be handled in HI-TRAC without needing the Supplemental Cooling System (see table above)*, passively rejecting heat by natural convection and radiation to a hot ambient environment at 100°F in still air in a vertical orientation. In this orientation, there is apt to be a less of metal-to-metal contact between the physically distinct entities, viz., fuel, fuel basket, MPC shell and HI-TRAC cask. For this reason, the gaps resistance between these parts is higher than in a horizontally oriented HI-TRAC. To bound gaps resistance, the various parts are postulated to be in a centered configuration. MPC internal convection at a postulated low cavity pressure of 5 atm is included in the thermal model. The peak cladding temperature computed under these adverse Ultimate Heat Sink (UHS) assumptions is 872°F which is substantially lower than the temperature limit of 1058°F for moderate burnup fuel (MBF). Consequently, cladding integrity assurance is provided by large safety margins (in excess of 100°F) during onsite transfer of an MPC containing MBF emplaced in a HI-TRAC cask.

As a defense-in-depth measure, cladding integrity is demonstrated for a theoretical bounding scenario. For this scenario, all means of convective heat dissipation within the canister are neglected in addition to the bounding relative configuration for the fuel, basket, MPC shell and HI-TRAC overpack assumption stated earlier for the vertical orientation. This means that the fuel is centered in the basket cells, the basket is centered in the MPC shell and the MPC shell is centered in the HI-TRAC overpack to maximize gaps thermal resistance. The peak cladding temperature computed for this scenario (1025°F) is below the short-term limit of 1058°F.

For high burnup fuel (HBF), however, the maximum computed fuel cladding temperature reported in Table 4.5.42 is significantly greater than the temperature limit of 752°F for HBF. Consequently, it is necessary to utilize the SCS described at the beginning of this section and in Appendix 2.C during onsite transfer of an MPC containing HBF emplaced in a HI-TRAC transfer cask. As stated earlier, the exact design and operation of the SCS is necessarily site-specific. The design is required to satisfy the specifications and operational requirements of Appendix 2.C to ensure compliance with ISG-11 [4.1.4] temperature limits.

As discussed in Subsection 4.5.41.1-6, MPC fuel unloading operations are performed with the MPC inside the HI-TRAC cask. For this operation, a helium cooldown system is engaged to the MPC via lid access ports and a forced helium cooling of the fuel and MPC is initiated. With the HI-TRAC cask external surfaces dissipating heat to a UHS in a manner in which the ambient air access is not restricted by bounding surfaces or large objects in the immediate vicinity of the cask, the temperatures reported in Table 4.5.42 will remain bounding during fuel unloading

operations.

4.5.5.2 Moisture Removal Limits and Requirements

Vacuum Drying (VD) is permitted for MBF under certain conditions. If these conditions are not met, or if the MPC also contains HBF, then the FHD must be used for moisture removal. The requirements and limits are listed in the following table:

Condition	Fuel in MPC	HI-TRAC Annulus Cooling Requirement	MPC Heat Load (kW)	Moisture Removal Method
1	All MBF	Standing Water	MPC-24: ≤ 20.88 MPC-24E: N/A** MPC-32: N/A** MPC-68: ≤ 21.52	VD*
2	All MBF	Circulating Water	≤ 28.74 ***	VD*
3	All MBF	None	> 28.74	FHD
4	One or more HBF	None	Any	FHD

* The FHD drying method is also acceptable under the Condition 1 and Condition 2 heat loads, in which case HI-TRAC annulus cooling is not required.

** These MPC types cannot be vacuum dried with standing water. Circulating water (Condition 2) is required for these types.

*** Vacuum drying for MPC heat loads greater than 23 kW is limited to 40 hours.

Condition 3 mandates the use of the FHD at higher heat loads for MBF drying. This will assure that cladding temperature limits are met at these higher heat loads (See Paragraph 4.5.3.2).

As stated in Subsection 4.5.3.1-4, above, an axisymmetric FLUENT thermal model of the MPC is developed for the vacuum condition. For the MPC-24E and MPC-32 designs, and for the higher heat load ranges in the MPC-24 and MPC-68 designs, the model also includes an isotropic fuel basket thermal conductivity. Each MPC is analyzed at its respective design the maximum heat load for which vacuum drying is permitted. The steady-state peak cladding results, with partial recognition for higher axial heat dissipation where included, are summarized in Table 4.5.59. The peak fuel clad temperatures for moderate burnup fuel during short-term vacuum drying operations with design-basis maximum heat loads are calculated to be less than 1058°F for all MPC baskets by a significant margin.

4.5.6 Maximum Internal Pressure

After fuel loading and vacuum drying, but prior to installing the MPC closure ring, the MPC is initially filled with helium. During handling and on-site transfer operations in the HI-TRAC transfer cask, the gas temperature will correspond to the thermal conditions within the MPC. Based on the calculations described in Subsection 4.5.5.1 that yield conservative temperatures, the ~~maximum~~ MPC internal pressure is determined for normal onsite transport conditions, as well as off-normal conditions of a postulated accidental release of fission product gases caused by fuel rod rupture. Based on NUREG-1536 [4.4.10] recommended fission gases release fraction data, net free volume and initial fill gas pressure, the bounding maximum gas pressures with 1% and 10% rod rupture are given in Table 4.5.63. The MPC ~~maximum~~ gas pressures listed in Table 4.5.63, based on a lower than prescribed helium backfill level, are all below the MPC design internal pressure listed in Table 2.2.1.

As stated in Section 4.5.5.1, the gas temperature in the MPC at any given heat load will be less than that computed using the conservative model described in this section which credits approximately 30% less helium than that prescribed. In accordance with the ideal gas law, the gas pressure rises in direct proportion to the increase in the average temperature of the MPC cavity from ambient temperature up to operating conditions. A lesser rise in temperature (due to increased thermosiphon action under actual helium backfill requirements) will result in a corresponding smaller rise in gas pressure. An approximately 40% increase in the initial gas pressure based on actual backfill requirements compared to analyzed backfill quantities, therefore, is mitigated by a smaller rise in the gas pressure. Noting that the gas pressure in the analyzed condition (see Table 4.5.6 and discussion in preceding paragraph) had over 100% margin against the analyzed maximum permissible pressure (200 psig per Table 2.2.1) the maximum pressure in the MPC is guaranteed to remain below 200 psig and thus the physical integrity of the confinement boundary is assured.

Table 4.5.1

EFFECTIVE RADIAL THERMAL CONDUCTIVITY OF THE WATER JACKET

Temperature (°F)	Thermal Conductivity (Btu/ft-hr-°F)
200	1.376
450	1.408
700	1.411

Table 4.5.2†

HI-TRAC TRANSFER CASK LOWERBOUND
WEIGHTS AND THERMAL INERTIAS

Component	Weight (lbs)	Heat Capacity (Btu/lb-°F)	Thermal Inertia (Btu/°F)
Water Jacket	7,000	1.0	7,000
Lead	52,000	0.031	1,612
Carbon Steel	40,000	0.1	4,000
Alloy-X MPC (empty)	39,000	0.12	4,680
Fuel	40,000	0.056	2,240
MPC Cavity Water*	6,500	1.0	6,500
			26,032 (Total)
* Conservative lower bound water mass.			

Table 4.5.32

*MAXIMUM ALLOWABLE TIME FOR WET
TRANSFER OPERATIONS*

<i>Initial Temperature (°F)</i>	<i>Time Duration (hr)</i>
115	19.4
120	18.4
125	17.4
130	16.4
135	15.4
140	14.4
145	13.4
150	12.4

Table 4.5.42

**HI-TRAC TRANSFER CASK STEADY-STATE
MAXIMUM TEMPERATURES**

Component	Temperature [°F]
Fuel Cladding	872 ¹
MPC Basket	852
Basket Periphery	600
MPC Outer Shell Surface	455
HI-TRAC Inner Shell Inner Surface	322
Water Jacket Inner Surface	314
Enclosure Shell Outer Surface	224
Water Jacket Bulk Water	258
Axial Neutron Shield [†]	258

Table 4.5.59

**PEAK CLADDING TEMPERATURE IN VACUUM[†]
(MODERATE BURNUP FUEL ONLY)**

MPC	Lower Decay Heat Load Range Temperatures (°F)	Higher Decay Heat Load Range Temperature (°F)
MPC-24	827	960
MPC-68	822	1014
MPC-32	n/a	1040
MPC-24E	n/a	942

¹ This calculated value exceeds the allowable limit for high-burnup fuel. A Supplemental Cooling System that satisfies the criteria in Appendix 2.C shall be used to comply with applicable temperature limits when an MPC contains one or more high burnup fuel assemblies or exceeds a threshold heat load (see Section 4.5.5.1).

[†] Local neutron shield section temperature.

[†] Steady state temperatures at the MPC design maximum heat load reported.

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Table 4.5.63

SUMMARY OF MPC CONFINEMENT BOUNDARY PRESSURES[†] FOR
NORMAL HANDLING AND ONSITE TRANSPORT

Condition	Pressure (psig)
MPC-24:	
<i>Assumed</i> initial backfill (at 70°F)	31.3
Normal condition	76.0
With 1% rod rupture	76.8
With 10% rod rupture	83.7
MPC-68:	
<i>Assumed</i> initial backfill (at 70°F)	31.3
Normal condition	76.0
With 1% rods rupture	76.5
With 10% rod rupture	80.6
MPC-32:	
<i>Assumed</i> initial backfill (at 70°F)	31.3
Normal condition	76.0
With 1% rods rupture	77.1
With 10% rod rupture	86.7
MPC-24E:	
<i>Assumed</i> initial backfill (at 70°F)	31.3
Normal condition	76.0
With 1% rods rupture	76.8
With 10% rod rupture	83.7

[†] Includes gas from BPRA rods for PWR MPCs

8.1 PROCEDURE FOR LOADING THE HI-STORM 100 SYSTEM IN THE SPENT FUEL POOL

8.1.1 Overview of Loading Operations:

The HI-STORM 100 System is used to load, transfer and store spent fuel. Specific steps are performed to prepare the HI-STORM 100 System for fuel loading, to load the fuel, to prepare the system for storage and to place it in storage at an ISFSI. The MPC transfer may be performed in the cask receiving area, at the ISFSI, or any other location deemed appropriate by the user. HI-TRAC and/or HI-STORM may be transferred between the ISFSI and the fuel loading facility using a specially designed transporter, heavy haul transfer trailer, or any other load handling equipment designed for such applications as long as the lift height restrictions are met (lift height restrictions apply only to suspended forms of transport). Users shall develop detailed written procedures to control on-site transport operations. Section 8.1.2 provides the general procedures for rigging and handling of the HI-STORM overpack and HI-TRAC transfer cask. Figure 8.1.1 shows a general flow diagram of the HI-STORM loading operations.

Refer to the boxes of Figure 8.1.2 for the following description. At the start of loading operations, an empty MPC is upended (Box 1). The empty MPC is raised and inserted into HI-TRAC (Box 2). The annulus is filled with plant demineralized water† and the MPC is filled with either spent fuel pool water or plant demineralized water (borated as required) (Box 3). An inflatable seal is installed in the upper end of the annulus between the MPC and HI-TRAC to prevent spent fuel pool water from contaminating the exterior surface of the MPC. HI-TRAC and the MPC are then raised and lowered into the spent fuel pool for fuel loading using the lift yoke (Box 4). Pre-selected assemblies are loaded into the MPC and a visual verification of the assembly identification is performed (Box 5).

While still underwater, a thickly shielded lid (the MPC lid) is installed using either slings attached to the lift yoke or the optional Lid Retention System (Box 6). The lift yoke remotely engages to the HI-TRAC lifting trunnions to lift the HI-TRAC and loaded MPC close to the spent fuel pool surface (Box 7). When radiation dose rate measurements confirm that it is safe to remove the HI-TRAC from the spent fuel pool, the cask is removed from the spent fuel pool. If the Lid Retention System is being used, the HI-TRAC top lid bolts are installed to secure the MPC lid for the transfer to the cask preparation area. The lift yoke and HI-TRAC are sprayed with demineralized water to help remove contamination as they are removed from the spent fuel pool.

HI-TRAC is placed in the designated preparation area and the Lift Yoke and Lid Retention System (if utilized) are removed. The next phase of decontamination is then performed. The top surfaces of the MPC lid and the upper flange of HI-TRAC are decontaminated. The Temporary Shield Ring (if utilized) is installed and filled with water and the neutron shield jacket is filled with water (if drained). The inflatable annulus seal is removed, and the annulus shield (if utilized) is installed. The Temporary Shield Ring provides additional personnel shielding around the top of the HI-TRAC during MPC closure operations. The annulus shield provides additional personnel shielding at the top of the annulus and also prevents small items from being dropped into the annulus. Dose rates are measured at the MPC lid to ensure that the dose rates are within

† Users may substitute domestic water in each step where demineralized water is specified.

expected values.

The MPC water level is lowered slightly, the MPC is vented, and the MPC lid is seal welded using the automated welding system (Box 8). Visual examinations are performed on the tack welds. Liquid penetrant (PT) examinations are performed on the root and final passes. An ultrasonic or multi-layer PT examination is performed on the MPC Lid-to-Shell weld to ensure that the weld is satisfactory. As an alternative to volumetric examination of the MPC lid-to-shell weld, a multi-layer PT is performed including one intermediate examination after approximately every three-eighth inch of weld depth. The water level is raised to the top of the MPC and a hydrostatic test followed by an additional liquid penetrant examination is performed on the MPC Lid-to-Shell weld to verify structural integrity. To calculate the helium backfill requirements for the MPC (if the backfill is based upon helium mass or volume measurements), the free volume inside the MPC must first be determined. This free volume may be determined by measuring the volume of water displaced or any other suitable means.

Depending upon the burn-up *or decay heat load* of the fuel to be loaded in the MPC, moisture is removed from the MPC using either a vacuum drying system or forced helium dehydration system. For MPCs without high burn-up fuel *and with sufficiently low decay heat*, the vacuum drying system may be connected to the MPC and used to remove all liquid water from the MPC in a stepped evacuation process (Box 9). A stepped evacuation process is used to preclude the formation of ice in the MPC and vacuum drying system lines. The internal pressure is reduced to below 3 torr and held for 30 minutes to ensure that all liquid water is removed.

For high-burn-up fuel *or MPCs with high decay heat*, or as an alternative for MPCs without high burn-up fuel *and with lower decay heat*, a forced helium dehydration system is utilized to remove residual moisture from the MPC. Gas is circulated through the MPC to evaporate and remove moisture. The residual moisture is condensed until no additional moisture remains in the MPC. The temperature of the gas exiting the system demister is maintained below 21 °F for a minimum of 30 minutes to ensure that all liquid water is removed.

Following MPC moisture removal, the MPC is backfilled with a predetermined amount of helium gas. If the MPC contains high burn-up fuel *or has a sufficiently high decay heat load*, then a Supplemental Cooling System (SCS) ~~(if required)~~ is connected to the HI-TRAC annulus prior to helium backfill and is used to circulate coolant to maintain fuel cladding temperatures below ISG-11 Rev. 3 limits (See Figure 2.C.1). The helium backfill ensures adequate heat transfer during storage, and provides an inert atmosphere for long-term fuel integrity. Cover plates are installed and seal welded over the MPC vent and drain ports with liquid penetrant examinations performed on the root and final passes (for multi-pass welds) (Box 10). *The cover plate welds are helium leakage tested to confirm that they meet the established leakage rate criteria.*

The MPC closure ring is then placed on the MPC and dose rates are measured at the MPC lid to ensure that the dose rates are within expected values. The closure ring is aligned, tacked in place and seal welded providing redundant closure of the MPC confinement boundary closure welds. Tack welds are visually examined, and the root and final welds are inspected using the liquid penetrant examination technique to ensure weld integrity.

The annulus shield (if utilized) is removed and the remaining water in the annulus is drained. The Temporary Shield Ring (if utilized) is drained and removed. The MPC lid and accessible areas of the top of the MPC shell are smeared for removable contamination and HI-TRAC dose rates are measured. HI-TRAC top lid³ is installed and the bolts are torqued (Box 11). The MPC lift cleats are installed on the MPC lid. The MPC lift cleats are the primary lifting point on the MPC. MPC slings are installed between the MPC lift cleats and the lift yoke (Box 12).

If the HI-TRAC 125 is being used, the transfer lid is attached to the HI-TRAC as follows. The HI-TRAC is positioned above the transfer slide to prepare for bottom lid replacement. The transfer slide consists of an adjustable-height rolling carriage and a pair of channel tracks. The transfer slide supports the transfer step which is used to position the two lids at the same elevation and creates a tight seam between the two lids to eliminate radiation streaming. The overhead crane is shut down to prevent inadvertent operation. The transfer slide carriage is raised to support the pool lid while the bottom lid bolts are removed. The transfer slide then lowers the pool lid and replaces the pool lid with the transfer lid. The carriage is raised and the bottom lid bolts are replaced. The MPC lift cleats and slings support the MPC during the transfer operations. Following the transfer, the MPC slings are disconnected and HI-TRAC is positioned for MPC transfer into HI-STORM.

MPC transfer may be performed inside or outside the fuel building (Box 13). Similarly, HI-TRAC and HI-STORM may be transferred to the ISFSI in several different ways (Box 14 and 15). The empty HI-STORM overpack is inspected and positioned with the lid removed. Vent duct shield inserts¹ are installed in the HI-STORM exit vent ducts. The vent duct shield inserts prevent radiation streaming from the HI-STORM Overpack as the MPC is lowered past the exit vents. If the HI-TRAC 125D is used, the mating device is positioned on top of the HI-STORM. The HI-TRAC is placed on top of HI-STORM. An alignment device (or mating device in the case of HI-TRAC 125D) helps guide HI-TRAC during this operation². The MPC may be lowered using the MPC downloader, the main crane hook or other similar devices. The MPC downloader (if used) may be attached to the HI-TRAC lid or mounted to the overhead lifting device. The MPC slings are attached to the MPC lift cleats.

If used, the SCS will be disconnected from the HI-TRAC and the HI-TRAC annulus drained, prior to transfer of the MPC from the HI-TRAC to the HI-STORM. If the transfer doors are used (i.e. not the HI-TRAC 125D), the MPC is raised slightly, the transfer lid door locking pins are removed and the doors are opened. If the HI-TRAC 125D is used, the pool lid is removed and the mating device drawer is opened. Optional trim plates may be installed on the top and bottom of both doors (or drawer for HI-TRAC 125D) and secured using hand clamps. The trim plates eliminate radiation streaming above and below the doors (drawer). The MPC is lowered into HI-STORM. Following verification that the MPC is fully lowered, the MPC slings are disconnected from the lifting device and lowered onto the MPC lid. The trim plates are removed, the doors (or drawer) are closed. The empty HI-TRAC must be removed with the doors open when the HI-

¹ Vent duct shield inserts are only used on the HI-STORM 100.

² The alignment guide may be configured in many different ways to accommodate the specific sites. See Table 8.1.6.

³ Users with the optional HI-TRAC Lid Spacer shall modify steps in their procedures to install and remove the spacer together with top lid

STORM 100S is used to prevent interference with the lift cleats and slings. HI-TRAC is removed from on top of HI-STORM. The MPC slings and MPC lift cleats are removed. Hole plugs are installed in the empty MPC lifting holes to fill the voids left by the lift cleat bolts. The alignment device (or mating device with pool lid for HI-TRAC 125D) and vent duct shield inserts (if used) are removed, and the HI-STORM lid is installed. The exit vent gamma shield cross plates, temperature elements (if used) and vent screens are installed. The HI-STORM lid studs and nuts are installed. The HI-STORM is secured to the transporter (as applicable) and moved to the ISFSI pad. The HI-STORM Overpack and HI-TRAC transfer cask may be moved using a number of methods as long as the lifting equipment requirements are met. For sites with high seismic conditions, the HI-STORM 100A is anchored to the ISFSI. Once located at the storage pad, the inlet vent gamma shield cross plates are installed and the shielding effectiveness test is performed. Finally, the temperature elements and their instrument connections are installed (if used), and the air temperature rise testing (if required) is performed to ensure that the system is functioning within its design parameters.

8.1.2 HI-TRAC and HI-STORM Receiving and Handling Operations

Note:

HI-TRAC may be received and handled in several different configurations and may be transported on-site in a horizontal or vertical orientation. This section provides general guidance for HI-TRAC and HI-STORM handling. Site-specific procedures shall specify the required operational sequences based on the handling configuration at the sites.

1. Vertical Handling of HI-TRAC:
 - a. Verify that the lift yoke load test certifications are current.
 - b. Visually inspect the lifting device (lift yoke or lift links) and the lifting trunnions for gouges, cracks, deformation or other indications of damage. Replace or repair damaged components as necessary.
 - c. Engage the lift yoke to the lifting trunnions. See Figure 8.1.3.
 - d. Apply lifting tension to the lift yoke and verify proper engagement of the lift yoke.

Note:

Refer to the site's heavy load handling procedures for lift height, load path, floor loading and other applicable load handling requirements.

Warning:

When lifting the loaded HI-TRAC with only the pool lid, the HI-TRAC should be carried as low as practicable. This minimizes the dose rates due to radiation scattering from the floor. Personnel should remain clear of the area and the HI-TRAC should be placed in position as soon as practicable.

- e. Raise HI-TRAC and position it accordingly.
2. Upending of HI-TRAC in the Transfer Frame:
 - a. Position HI-TRAC under the lifting device. Refer to Step 1, above.

- b. If necessary, remove the missile shield from the HI-TRAC Transfer Frame. See Figure 8.1.4.
 - c. Verify that the lift yoke load test certifications are current.
 - d. Visually inspect the lift yoke and the lifting trunnions for gouges, cracks, deformation or other indications of damage. Repair or replace damaged components as necessary.
 - e. Deleted.
 - f. Engage the lift yoke to the lifting trunnions. See Figure 8.1.3.
 - g. Apply lifting tension to the lift yoke and verify proper engagement of the lift yoke.
 - h. Slowly rotate HI-TRAC to the vertical position keeping all rigging as close to vertical as practicable. See Figure 8.1.4.
 - i. If used, lift the pocket trunnions clear of the Transfer Frame rotation trunnions.
3. Downending of HI-TRAC in the Transfer Frame:

ALARA Warning:

A loaded HI-TRAC should only be downended with the transfer lid or other auxiliary shielding installed.

- a. Position the Transfer Frame under the lifting device.
 - b. Verify that the lift yoke load test certifications are current.
 - c. Visually inspect the lift yoke and the lifting trunnions for gouges, cracks, deformation or other indications of damage. Repair or replace damaged components as necessary.
 - d. Deleted.
 - e. Deleted.
 - f. Engage the lift yoke to the lifting trunnions. See Figure 8.1.3.
 - g. Apply lifting tension to the lift yoke and verify proper lift yoke engagement.
 - h. Position the pocket trunnions to receive the Transfer Frame rotation trunnions. See Figure 8.1.4 (Not used for HI-TRAC 125D).
 - i. Slowly rotate HI-TRAC to the horizontal position keeping all rigging as close to vertical as practicable.
 - j. Disengage the lift yoke.
4. Horizontal Handling of HI-TRAC in the Transfer Frame:
- a. Verify that the Transfer Frame is secured to the transport vehicle as necessary.
 - b. Downend HI-TRAC on the Transfer Frame per Step 3, if necessary.

- c. If necessary, install the HI-TRAC missile Shield on the HI-STAR 100 Transfer Frame (See Figure 8.1.4).

5. Vertical Handling of HI-STORM:

Note:

The HI-STORM 100 Overpack may be lifted with a special lifting device that engages the overpack anchor blocks with threaded studs and connects to a cask transporter, crane, or similar equipment. The device is designed in accordance with ANSI N14.6.

- a. Visually inspect the HI-STORM lifting device for gouges, cracks, deformation or other indications of damage.
- b. Visually inspect the transporter lifting attachments for gouges, cracks, deformation or other indications of damage.
- c. If necessary, attach the transporter's lifting device to the transporter and HI-STORM..
- d. Raise and position HI-STORM accordingly. See Figure 8.1.5.

6. Empty MPC Installation in HI-TRAC:

Note:

To avoid side loading the MPC lift lugs, the MPC must be upended in the MPC Upending Frame (or equivalent). See Figure 8.1.6.

- a. If necessary, rinse off any road dirt with water. Remove any foreign objects from the MPC internals.
- b. If necessary, upend the MPC as follows:
 1. Visually inspect the MPC Upending Frame for gouges, cracks, deformation or other indications of damage. Repair or replace damaged components as necessary.
 2. Install the MPC on the Upending Frame. Make sure that the banding straps are secure around the MPC shell. See Figure 8.1.6.
 3. Inspect the Upending Frame slings in accordance with the site's lifting equipment inspection procedures. Rig the slings around the bar in a choker configuration to the outside of the cleats. See Figure 8.1.6.
 4. Attach the MPC upper end slings of the Upending Frame to the main overhead lifting device. Attach the bottom-end slings to a secondary lifting device (or a chain fall attached to the primary lifting device) (See Figure 8.1.6).
 5. Raise the MPC in the Upending Frame.

Warning:

The Upending Frame corner should be kept close to the ground during the upending process.

6. Slowly lift the upper end of the Upending Frame while lowering the bottom end of the Upending Frame.
 7. When the MPC approaches the vertical orientation, tension on the lower slings may be released.
 8. Place the MPC in a vertical orientation.
 9. Disconnect the MPC straps and disconnect the rigging.
- c. Install the MPC in HI-TRAC as follows:
1. Install the four-point lift sling to the lift lugs inside the MPC. See Figure 8.1.7.
 2. Raise and place the MPC inside HI-TRAC.

Note:

An alignment punch mark is provided on HI-TRAC and the top edge of the MPC. Similar marks are provided on the MPC lid and closure ring. See Figure 8.1.8.

3. Rotate the MPC so the alignment marks agree and seat the MPC inside HI-TRAC. Disconnect the MPC rigging or the MPC lift rig.

8.1.3 HI-TRAC and MPC Receipt Inspection and Loading Preparation

Note:

Receipt inspection, installation of the empty MPC in the HI-TRAC, and lower fuel spacer installation may occur at any location or be performed at any time prior to complete submersion in the spent fuel pool as long as appropriate steps are taken to prevent contaminating the exterior of the MPC or interior of the HI-TRAC.

ALARA Note:

A bottom protective cover may be attached to HI-TRAC pool lid bottom. This will help prevent imbedding contaminated particles in HI-TRAC bottom surface and ease the decontamination effort.

1. Place HI-TRAC in the cask receiving area. Perform appropriate contamination and security surveillances, as required.
2. If necessary, remove HI-TRAC Top Lid by removing the top lid bolts and using the lift sling. See Figure 8.1.9 for rigging.
 - a. Rinse off any road dirt with water. Inspect all cavity locations for foreign objects. Remove any foreign objects.
 - b. Perform a radiological survey of the inside of HI-TRAC to verify there is no residual contamination from previous uses of the cask.
3. Disconnect the rigging.
4. Store the Top Lid and bolts in a site-approved location.

5. If necessary, configure HI-TRAC with the pool lid as follows:

ALARA Warning:

The bottom lid replacement as described below may be performed only on an empty HI-TRAC.

- a. Inspect the seal on the pool lid for cuts, cracks, gaps and general condition. Replace the seal if necessary.
 - b. Remove the bottom lid bolts and store them temporarily.
 - c. Raise the empty HI-TRAC and position it on top of the pool lid.
 - d. Inspect the pool lid bolts for general condition. Replace worn or damaged bolts with new bolts.
 - e. Install the pool lid bolts. See Table 8.1.5 for torque requirements.
 - f. If necessary, thread the drain connector pipe to the pool lid.
 - g. Store the HI-TRAC Transfer Lid in a site-approved location.
6. At the site's discretion, perform an MPC receipt inspection and cleanliness inspection in accordance with a site-specific inspection checklist.
7. Install the MPC inside HI-TRAC and place HI-TRAC in the designated preparation area. See Section 8.1.2.

Note:

Upper fuel spacers are fuel-type specific. Not all fuel types require fuel spacers. Upper fuel spacer installation may occur any time prior to MPC lid installation.

8. Install the upper fuel spacers in the MPC lid as follows:

Warning:

Never work under a suspended load.

- a. Position the MPC lid on supports to allow access to the underside of the MPC lid.
 - b. Thread the fuel spacers into the holes provided on the underside of the MPC lid. See Figure 8.1.10 and Table 8.1.5 for torque requirements.
 - c. Install threaded plugs in the MPC lid where and when spacers will not be installed, if necessary. See Table 8.1.5 for torque requirements.
9. At the user's discretion perform an MPC lid and closure ring fit test:

Note:

It may be necessary to perform the MPC installation and inspection in a location that has sufficient crane clearance to perform the operation.

- a. Visually inspect the MPC lid rigging (See Figure 8.1.9).
- b. At the user's discretion, raise the MPC lid such that the drain line can be installed. Install the drain line to the underside of the MPC lid. See Figure 8.1.11.

Note:

The MPC Shell is relatively flexible compared to the MPC Lid and may create areas of local contact that impede Lid insertion in the Shell. Grinding of the MPC Lid below the minimum diameter on the drawing is permitted to alleviate interference with the MPC Shell in areas of localized contact. If the amount of material removed from the surface exceeds 1/8", the surface shall be examined by a liquid penetrant method (NB-2546). The weld prep for the Lid-to-Shell weld shall be maintained after grinding.

- c. Align the MPC lid and lift yoke so the drain line will be positioned in the MPC drain location. See Figure 8.1.12. Install the MPC lid. Verify that the MPC lid fit and weld prep are in accordance with the design drawings.

ALARA Note:

The closure ring is installed by hand. Some grinding may be required on the closure ring to adjust the fit.

- d. Install, align and fit-up the closure ring.
 - e. Verify that closure ring fit and weld prep are in accordance with the fabrication drawings or the approved design drawings.
 - f. Remove the closure ring, vent and drain port cover plates and the MPC lid. Disconnect the drain line. Store these components in an approved plant storage location.
10. At the user's discretion, perform an MPC vent and drain port cover plate fit test and verify that the weld prep is in accordance with the approved fabrication drawings.

Note:

Fuel spacers are fuel-type specific. Not all fuel types require fuel spacers. Lower fuel spacers are set in the MPC cells manually. No restraining devices are used.

- 11. Install lower fuel spacers in the MPC (if necessary). See Figure 8.1.10.
- 12. Fill the MPC and annulus as follows:
 - a. Fill the annulus with plant demineralized water to just below the inflatable seal seating surface.

Caution:

Do not use any sharp tools or instruments to install the inflatable seal. Some air in the inflatable seal helps in the installation.

- b. Manually insert the inflatable annulus seal around the MPC. See Figure 8.1.13.
- c. Ensure that the seal is uniformly positioned in the annulus area.
- d. Inflate the seal.
- e. Visually inspect the seal to ensure that it is properly seated in the annulus. Deflate, adjust and inflate the seal as necessary. Replace the seal as necessary.

ALARA Note:

Bolt plugs, placed in, or waterproof tape over empty bolt holes, reduce the time required for decontamination.

13. At the user's discretion, install HI-TRAC top lid bolt plugs and/or apply waterproof tape over any empty bolt holes.

ALARA Note:

Keeping the water level below the top of the MPC prevents splashing during handling.

14. Fill the MPC with either demineralized water or spent fuel pool water to approximately 12 inches below the top of the MPC shell. Refer to Tables 2.1.14 and 2.1.16 for boron concentration requirements.
15. If necessary for plant crane capacity limitations, drain the water from the neutron shield jacket. See Tables 8.1.1 through 8.1.4 as applicable.
16. Place HI-TRAC in the spent fuel pool as follows:

ALARA Note:

The term "Spent Fuel Pool" is used generically to refer to the users designated cask loading location. The optional Annulus Overpressure System is used to provide further protection against MPC external shell contamination during in-pool operations.

- a. If used, fill the Annulus Overpressure System lines and reservoir with demineralized water and close the reservoir valve. Attach the Annulus Overpressure System to the HI-TRAC. See Figure 8.1.14.
- b. Verify spent fuel pool for boron concentration requirements in accordance with Tables 2.1.14 and 2.1.16.
- c. Engage the lift yoke to HI-TRAC lifting trunnions and position HI-TRAC over the cask loading area with the basket aligned to the orientation of the spent fuel racks.

ALARA Note:

Wetting the components that enter the spent fuel pool may reduce the amount of decontamination work to be performed later.

- d. Wet the surfaces of HI-TRAC and lift yoke with plant demineralized water while slowly lowering HI-TRAC into the spent fuel pool.
- e. When the top of the HI-TRAC reaches the elevation of the reservoir, open the Annulus Overpressure System reservoir valve. Maintain the reservoir water level at approximately 3/4 full the entire time the cask is in the spent fuel pool.
- f. Place HI-TRAC on the floor of the cask loading area and disengage the lift yoke. Visually verify that the lift yoke is fully disengaged. Remove the lift yoke from the spent fuel pool while spraying the crane cables and yoke with plant demineralized water.

- g. Observe the annulus seal for signs of air leakage. If leakage is observed (by the steady flow of bubbles emanating from one or more discrete locations) then immediately remove the HI-TRAC from the spent fuel pool and repair or replace the seal.

8.1.4 MPC Fuel Loading

Note:

An underwater camera or other suitable viewing device may be used for monitoring underwater operations.

Note:

When loading MPCs requiring soluble boron, the boron concentration of the water shall be checked in accordance with Tables 2.1.14 and 2.1.16 before and during operations with fuel and water in the MPC.

1. Perform a fuel assembly selection verification using plant fuel records to ensure that only fuel assemblies that meet all the conditions for loading as specified in Section 2.1.9 have been selected for loading into the MPC.
2. Load the pre-selected fuel assemblies into the MPC in accordance with the approved fuel loading pattern.
3. Perform a post-loading visual verification of the assembly identification to confirm that the serial numbers match the approved fuel loading pattern.

8.1.5 MPC Closure

Note:

The user may elect to use the Lid Retention System (See Figure 8.1.15) to assist in the installation of the MPC lid and lift yoke, and to provide the means to secure the MPC lid in the event of a drop accident during loaded cask handling operations outside of the spent fuel pool. The user is responsible for evaluating the additional weight imposed on the cask, lift yoke, crane and floor prior to use. See Tables 8.1.1 through 8.1.4 as applicable. The following guidance describes installation of the MPC lid using the lift yoke. The MPC lid may also be installed separately.

Depending on facility configuration, users may elect to perform MPC closure operations with the HI-TRAC partially submerged in the spent fuel pool. If opted, operations involving removal of the HI-TRAC from the spent fuel pool shall be sequenced accordingly.

1. Remove the HI-TRAC from the spent fuel pool as follows:
 - a. Visually inspect the MPC lid rigging or Lid Retention System in accordance with site-approved rigging procedures. Attach the MPC lid to the lift yoke so that MPC lid, drain line and trunnions will be in relative alignment. Raise the MPC lid and adjust the rigging so the MPC lid hangs level as necessary.
 - b. Install the drain line to the underside of the MPC lid. See Figure 8.1.17.

- c. Align the MPC lid and lift yoke so the drain line will be positioned in the MPC drain location and the cask trunnions will also engage. See Figure 8.1.11 and 8.1.17.

ALARA Note:

Pre-wetting the components that enter the spent fuel pool may reduce the amount of decontamination work to be performed later.

- d. Slowly lower the MPC lid into the pool and insert the drain line into the drain access location and visually verify that the drain line is correctly oriented. See Figure 8.1.12.
- e. Lower the MPC lid while monitoring for any hang-up of the drain line. If the drain line becomes kinked or disfigured for any reason, remove the MPC lid and replace the drain line.

Note:

The outer diameter of the MPC lid will seat flush with the top edge of the MPC shell when properly installed. Once the MPC lid is installed, the HI-TRAC /MPC removal from the spent fuel pool should proceed in a continuous manner to minimize the rise in MPC water temperature.

- f. Seat the MPC lid in the MPC and visually verify that the lid is properly installed.
- g. Engage the lift yoke to HI-TRAC lifting trunnions.
- h. Apply a slight tension to the lift yoke and visually verify proper engagement of the lift yoke to the lifting trunnions.

ALARA Note:

Activated debris may have settled on the top face of HI-TRAC and MPC during fuel loading. The cask top surface should be kept under water until a preliminary dose rate scan clears the cask for removal. Users are responsible for any water dilution considerations.

- i. Raise HI-TRAC until the MPC lid is just below the surface of the spent fuel pool. Survey the area above the cask lid to check for hot particles. Remove any activated or highly radioactive particles from HI-TRAC or MPC.
- j. Visually verify that the MPC lid is properly seated. Lower HI-TRAC, reinstall the lid, and repeat as necessary.
- k. Install the Lid Retention System bolts if the lid retention system is used.
- l. Continue to raise the HI-TRAC under the direction of the plant's radiological control personnel. Continue rinsing the surfaces with demineralized water. When the top of the HI-TRAC reaches the same elevation as the reservoir, close the Annulus Overpressure System reservoir valve (if used). See Figure 8.1.14.

Caution:

Users are required to take necessary actions to prevent boiling of the water in the MPC. This may be accomplished by performing a site-specific analysis to identify a time limitation to ensure that water boiling will not occur in the MPC prior to the initiation of draining operations. Chapter 4 of the FSAR provides some sample time limits for the time to initiation of draining for various spent fuel pool water temperatures using design basis heat loads. These time limits may be adopted if the user chooses not to perform a site-specific analysis. If time limitations are imposed, users shall have appropriate procedures and equipment to take action. One course of action involves initiating an MPC water flush for a certain duration and flow rate. Any site-specific analysis shall identify the methods to respond should it become likely that the imposed time limit could be exceeded. Refer to Tables 2.1.14 and 2.1.16 for boron concentration requirements whenever water is added to the loaded MPC.

- m. Remove HI-TRAC from the spent fuel pool while spraying the surfaces with plant demineralized water. Record the time.

ALARA Note:

Decontamination of HI-TRAC bottom should be performed using remote cleaning methods, covering or other methods to minimize personnel exposure. The bottom lid decontamination may be deferred to a convenient and practical time and location. Any initial decontamination should only be sufficient to preclude spread of contamination within the fuel building.

- n. Decontaminate HI-TRAC bottom and HI-TRAC exterior surfaces including the pool lid bottom. Remove the bottom protective cover, if used.
- o. If used, disconnect the Annulus Overpressure System from the HI-TRAC See Figure 8.1.14.
- p. Set HI-TRAC in the designated cask preparation area.

Note:

If the transfer cask is expected to be operated in an environment below 32 °F, the water jacket shall be filled with an ethylene glycol solution (25% ethylene glycol). Otherwise, the jacket shall be filled with demineralized water. Depending on weight limitations, the neutron shield jacket may remain filled (with pure water or 25% ethylene glycol solution, as required). Users shall evaluate the cask weights to ensure that cask trunnion, lifting devices and equipment load limitations are not exceeded.

- q. If previously drained, fill the neutron shield jacket with plant demineralized water or an ethylene glycol solution (25% ethylene glycol) as necessary.
- r. Disconnect the lifting slings or Lid Retention System (if used) from the MPC lid and disengage the lift yoke. Decontaminate and store these items in an approved storage location.

Warning:

MPC lid dose rates are measured to ensure that dose rates are within expected values. Dose rates exceeding the expected values could indicate that fuel assemblies not meeting the CoC may have been loaded.

- s. Measure the dose rates at the MPC lid and verify that the combined gamma and neutron dose is below expected values.
- t. Perform decontamination and a dose rate/contamination survey of HI-TRAC.
- u. Prepare the MPC annulus for MPC lid welding as follows:

ALARA Note:

If the Temporary Shield Ring is not used, some form of gamma shielding (e.g., lead bricks or blankets) should be placed in the trunnion recess areas of the HI-TRAC water jacket to eliminate the localized hot spot.

- v. Decontaminate the area around the HI-TRAC top flange and install the Temporary Shield Ring, (if used). See Figure 8.1.18.

ALARA Note:

The water in the HI-TRAC-to-MPC annulus provides personnel shielding. The level should be checked periodically and refilled accordingly.

- w. Attach the drain line to the HI-TRAC drain port and lower the annulus water level approximately 6 inches.

2. Prepare for MPC lid welding as follows:

Note:

The following steps use two identical Removable Valve Operating Assemblies (RVOAs) (See Figure 8.1.16) to engage the MPC vent and drain ports. The MPC vent and drain ports are equipped with metal-to-metal seals to minimize leakage during drying, and to withstand the long-term effects of temperature and radiation. The RVOAs allow the vent and drain ports to be operated like valves and prevent the need to hot tap into the penetrations during unloading operations. The RVOAs are purposely not installed until the cask is removed from the spent fuel pool to reduce the amount of decontamination.

Note:

The vent and drain ports are opened by pushing the RVOA handle down to engage the square nut on the cap and turning the handle fully in the counter-clockwise direction. The handle will not turn once the port is fully open. Similarly, the vent and drain ports are closed by turning the handle fully in the clockwise direction. The ports are closed when the handle cannot be turned further.

Note:

Steps involving preparation for welding may occur in parallel as long as precautions are taken to prevent contamination of the annulus.

- a. Clean the vent and drain ports to remove any dirt. Install the RVOAs (See Figure 8.1.16) to the vent and drain ports leaving caps open.

ALARA Warning:

Personnel should remain clear of the drain hoses any time water is being pumped or purged from the MPC. Assembly crud, suspended in the water, may create a radiation hazard to workers. Controlling the amount of water pumped from the MPC prior to welding keeps the fuel assembly cladding covered with water yet still allows room for thermal expansion.

Caution:

Personnel shall ensure that the water level is not lowered below the top of the fuel cladding to avoid exposing the fuel to atmosphere to prevent oxidation and potential fuel damage.

- b. Attach the water pump to the drain port (See Figure 8.1.19) and lower the water level to keep moisture away from the weld region.
- c. Disconnect the water pump.
- d. Carefully decontaminate the MPC lid top surface and the shell area above the inflatable seal
- e. Deflate and remove the inflatable annulus seal.

ALARA Note:

The MPC exterior shell survey is performed to evaluate the performance of the inflatable annulus seal. Indications of contamination could require the MPC to be unloaded. In the event that the MPC shell is contaminated, users must decontaminate the annulus. If the contamination cannot be reduced to acceptable levels, the MPC must be returned to the spent fuel pool and unloaded. The MPC may then be removed and the external shell decontaminated.

- f. Survey the MPC lid top surfaces and the accessible areas of the top three inches of the MPC.

ALARA Note:

The annulus shield is used to prevent objects from being dropped into the annulus and helps reduce dose rates directly above the annulus region. The annulus shield is hand installed and requires no tools.

- g. Install the annulus shield. See Figure 8.1.13.

3. Weld the MPC lid as follows:

ALARA Warning:

Grinding of MPC welds may create the potential for contamination. All grinding activities shall be performed under the direction of radiation protection personnel.

ALARA Warning:

It may be necessary to rotate or reposition the MPC lid slightly to achieve uniform weld gap and lid alignment. A punch mark is located on the outer edge of the MPC lid and shell. These marks are aligned with the alignment mark on the top edge of the HI-TRAC Transfer Cask (See Figure 8.1.8). If necessary, the MPC lid lift should be performed using a hand operated chain fall to closely control the lift to allow rotation and repositioning by hand. If the chain fall is hung from the crane hook, the crane should be tagged out of service to prevent inadvertent use during this operation. Continuous radiation monitoring is recommended.

- a. If necessary center the lid in the MPC shell using a hand-operated chain fall.

Note:

The MPC is equipped with lid shims that serve to close the gap in the joint for MPC lid closure weld.

- b. As necessary, install the MPC lid shims around the MPC lid to make the weld gap uniform.

ALARA Note:

The AWS Baseplate shield is used to further reduce the dose rates to the operators working around the top cask surfaces.

- c. Install the Automated Welding System baseplate shield. See Figure 8.1.9 for rigging.
- d. If used, install the Automated Welding System Robot.

Note:

It may be necessary to remove the RVOAs to allow access for the automated welding system. In this event, the vent and drain port caps should be opened to allow for thermal expansion of the MPC water.

Note:

Combustible gas monitoring as described in Step 3e and the associated Caution block are required by the HI-STORM 100 CoC (CoC Appendix B, Section 3.8) and may not be deleted without prior NRC approval via CoC amendment.

Caution:

Oxidation of Boral panels contained in the MPC may create hydrogen gas while the MPC is filled with water. Appropriate monitoring for combustible gas concentrations shall be performed prior to, and during MPC lid welding operations. The space below the MPC lid shall be exhausted or purged with inert gas prior to, and during MPC lid welding operations to provide additional assurance that flammable gas concentrations will not develop in this space.

- e. Perform combustible gas monitoring and exhaust or purge the space under the MPC lid with an inert gas to ensure that there is no combustible mixture present in the welding area.

- f. Perform the MPC lid-to-shell weld and NDE with approved procedures (See 9.1 and Table 2.2.15).
- g. Deleted.
- h. Deleted.
- i. Deleted.
- j. Deleted.

4. Perform hydrostatic testing as follows:

ALARA Note:

Testing is performed before the MPC is drained for ALARA reasons. A weld repair is a lower dose activity if water remains inside the MPC.

- a. Attach the drain line to the vent port and route the drain line to the spent fuel pool or the plant liquid radwaste system. See Figure 8.1.20 for the hydrostatic test arrangement.

ALARA Warning:

Water flowing from the MPC may carry activated particles and fuel particles. Apply appropriate ALARA practices around the drain line.

- b. Fill the MPC with either spent fuel pool water or plant demineralized water until water is observed flowing out of the vent port drain hose. Refer to Tables 2.1.14 and 2.1.16 for boron concentration requirements.
- c. Perform a hydrostatic test of the MPC as follows:
 - 1. Close the drain valve and pressurize the MPC to 125 +5/-0 psig.
 - 2. Close the inlet valve and monitor the pressure for a minimum of 10 minutes. The pressure shall not drop during the performance of the test.
 - 3. Following the 10-minute hold period, visually examine the MPC lid-to-shell weld for leakage of water. The acceptance criteria is no observable water leakage.
- d. Release the MPC internal pressure, disconnect the water fill line and drain line from the vent and drain port RVOAs leaving the vent and drain port caps open.
 - 1. Repeat the liquid penetrant examination on the MPC lid final pass.
- e. Repair any weld defects in accordance with the site's approved weld repair procedures. Re-perform the Ultrasonic (if necessary), PT, and Hydrostatic tests if weld repair is performed.

5. Drain the MPC as follows:

Caution:

For MPCs above a threshold heat load (see Technical Specifications), vacuum drying is subject to a time limit starting at completion of this operational step and ending when helium backfill is initiated. Do not begin this step for such an MPC unless intending to proceed shortly thereafter to vacuum drying.

- a. Attach the drain line to the vent port and route the drain line to the spent fuel pool or the plant liquid radwaste system. See Figure 8.1.20.

ALARA Warning:

Water flowing from the MPC may carry activated particles and fuel particles. Apply appropriate ALARA practices around the drain line.

- b. Attach the water fill line to the drain port and fill the MPC with either spent fuel pool water or plant demineralized water until water is observed flowing out of the drain line.
- c. Disconnect the water fill and drain lines from the MPC leaving the vent port valve open to allow for thermal expansion of the MPC water.

ALARA Warning:

Dose rates will rise as water is drained from the MPC. Continuous dose rate monitoring is recommended.

- d. Attach a regulated helium or nitrogen supply to the vent port.
- e. Attach a drain line to the drain port shown on Figure 8.1.21.
- f. Deleted
- g. Verify the correct pressure on the gas supply.
- h. Open the gas supply valve and record the time at the start of MPC draining.

Note:

An optional warming pad may be placed under the HI-TRAC Transfer Cask to replace the heat lost during the evaporation process of MPC drying. This may be used at the user's discretion for older and colder fuel assemblies to reduce vacuum drying times.

- i. Start the warming pad, if used.

Note:

Users may continue to purge the MPC to remove as much water as possible.

- j. Drain the water out of the MPC until water ceases to flow out of the drain line. Shut the gas supply valve. See Figure 8.1.21.
- k. Deleted.
- l. Disconnect the gas supply line from the MPC.

- m. Disconnect the drain line from the MPC.

Note:

Vacuum drying or moisture removal using FHD (for high burn-up fuel *or high decay heat*) is performed to remove moisture and oxidizing gasses from the MPC. This ensures a suitable environment for long-term storage of spent fuel assemblies and ensures that the MPC pressure remains within design limits. The vacuum drying process described herein reduces the MPC internal pressure in stages. Dropping the internal pressure too quickly may cause the formation of ice in the fittings. Ice formation could result in incomplete removal of moisture from the MPC. The moisture removal process limits bulk MPC temperatures by continuously circulating gas through the MPC. Section 8.1.5 Steps 6a through 6e are used for the vacuum drying method of drying and backfill. Section 8.1.5 Steps 7a through 7i are used for the FHD method of drying and backfill.

6. Dry and Backfill the MPC as follows (Vacuum Drying Method):

Note:

During vacuum drying, the annulus between the MPC and the HI-TRAC must be maintained full of water. Water lost due to evaporation or boiling must be replaced to maintain the water level. For MPCs above a threshold heat load (see Technical Specifications), water must be continuously flowed through the annulus at sufficient rate to ensure a water temperature at the outlet of the annulus below 125 °F. Confirmation of water outlet temperature must be confirmed via measurement.

- a. *Fill the annulus between the MPC and HI-TRAC with clean water. The water level must be within 6" of the top of the MPC. If required by MPC heat load connect a source of water with sufficient flow to maintain an exit water temperature below 125 °F during all vacuum drying operations.*
- a-b. Attach the drying system (VDS) to the vent and drain port RVOAs. See Figure 8.1.22a. Other equipment configurations that achieve the same results may also be used.

Note:

The vacuum drying system may be configured with an optional fore-line condenser. Other equipment configurations that achieve the same results may be used.

Note:

To prevent freezing of water, the MPC internal pressure should be lowered in incremental steps. The vacuum drying system pressure will remain at about 30 torr until most of the liquid water has been removed from the MPC.

- b-c. Open the VDS suction valve and reduce the MPC pressure to below 3 torr.
- e-d. Shut the VDS valves and verify a stable MPC pressure on the vacuum gage.

Note:

The MPC pressure may rise due to the presence of water in the MPC. The dryness test may need to be repeated several times until all the water has been removed. Leaks in the vacuum drying system, damage to the vacuum pump, and improper vacuum gauge calibration may cause repeated failure of the dryness verification test. These conditions should be checked as part of the corrective actions if repeated failure of the dryness verification test is occurring.

- d.e.* Perform the MPC drying pressure test in accordance with the technical specifications. *If MPC vacuum drying acceptance criteria are not met during allowable time, backfill the MPC cavity with helium to a pressure of ≥ 0.5 atm and reset the vacuum drying time (see Technical Specifications).*

Caution:

~~Limitations for the at vacuum duration are evaluated and established on a canister basis to ensure that acceptable cladding temperatures are not exceeded although a time limit of less than 2 hours at vacuum will bound any MPC.~~

- e.f.* Close the vent and drain port valves.
- f.g.* Disconnect the VDS from the MPC.
- g.h.* Stop the warming pad, if used.
- h.i.* Close the drain port RVOA cap and remove the drain port RVOA.

Note:

Helium backfill shall be in accordance with the Technical Specification using 99.995% (minimum) purity. Other equipment configurations that achieve the same results may be used.

- i.j.* Set the helium bottle regulator pressure to the appropriate pressure.
- j.k.* Purge the Helium Backfill System to remove oxygen from the lines.
- k.l.* Attach the Helium Backfill System to the vent port as shown on Figure 8.1.23 and open the vent port.
- l.m.* Slowly open the helium supply valve while monitoring the pressure rise in the MPC.

Note:

If helium bottles need to be replaced, the bottle valve needs to be closed and the entire regulator assembly transferred to the new bottle.

- m.n.* Carefully backfill the MPC in accordance with the technical specifications.
- o.* *If used, stop the water flow through the annulus between the MPC and HI-TRAC. Drain the water from the annulus*
- n.p.* Disconnect the helium backfill system from the MPC.
- o.q.* Close the vent port RVOA and disconnect the vent port RVOA.

7. Dry and Backfill the MPC as follows (FHD Method)::

Note:

Helium backfill shall be in accordance with the Technical Specification using 99.995% (minimum) purity. When using the FHD system to perform the MPC helium backfill, the FHD system shall be evacuated or purged and the system operated with 99.995% (minimum) purity helium.

- a. Attach the moisture removal system to the vent and drain port RVOAs. See Figure 8.1.22b. Other equipment configurations that achieve the same results may also be used.
- b. Circulate the drying gas through the MPC while monitoring the circulating gas for moisture. Collect and remove the moisture from the system as necessary.
- c. Continue the monitoring and moisture removal until LCO 3.1.1 is met for MPC dryness.
- d. Continue operation of the FHD system with the demister on.
- e. While monitoring the temperatures into and out of the MPC, adjust the helium pressure in the MPC to provide a fill pressure as required by the technical specifications.
- f. Open the FHD bypass line and Close the vent and drain port RVOAs.
- g. Close the vent and drain port RVOAs.
- h. Shutdown the FHD system and disconnect it from the RVOAs.
- i. Remove the vent and drain port RVOAs.

8. Weld the vent and drain port cover plates as follows:

Note:

The process provided herein may be modified to perform actions in parallel.

- a. Wipe the inside area of the vent and drain port recesses to dry and clean the surfaces.
- b. Place the cover plate over the vent port recess.
- c. Weld the cover plate.

Note:

ASME Boiler and Pressure Vessel Code [8.1.3], Section V, Article 6 provides the liquid penetrant inspection methods. The acceptance standards for liquid penetrant examination shall be in accordance with ASME Boiler and Pressure Vessel Code, Section III, Subsection NB, Article NB-5350 as specified on the Design Drawings. ASME Code, Section III, Subsection NB, Article NB-4450 provides acceptable requirements for weld repair. NDE personnel shall be qualified per the requirements of Section V of the Code or site-specific program.

- d. Perform NDE on the cover plate with approved procedures (See 9.1 and Table 2.2.15)
- e. Repair and weld defects in accordance with the site's approved code weld repair procedures.
- f. ~~Deleted~~ Perform a helium leakage rate test on the cover plate welds. (See 9.1 and Table 2.2.15). Acceptance Criteria are defined in Technical Specification LCO 3.1.1.
- g. ~~Deleted~~ Repair any weld defects in accordance with the site's approved code weld repair procedures.
- h. Deleted.
- i. Repeat for the drain port cover plate.

9. Weld the MPC closure ring as follows:

ALARA Note:

The closure ring is installed by hand. No tools are required. Localized grinding to achieve the desired fit and weld prep is allowed.

- a. Install and align the closure ring. See Figure 8.1.8.
- b. Weld the closure ring to the MPC shell and the MPC lid, and perform NDE with approved procedures (See 9.1 and Table 2.2.15).
- c. Deleted.
- d. Deleted.
- e. Deleted.
- f. Deleted.
- g. Deleted.
- h. Deleted.
- i. Deleted.
- j. If necessary, remove the AWS. See Figure 8.1.7 for rigging.

8.1.6 Preparation for Storage

ALARA Warning:

Dose rates will rise around the top of the annulus as water is drained from the annulus. Apply appropriate ALARA practices.

Caution:

Limitations for the handling an MPC containing high burn-up fuel in a HI-TRAC are evaluated and established on a canister basis to ensure that acceptable cladding temperatures are not exceeded. Refer to FSAR Section 4.5 for guidance.

- 1. Remove the annulus shield (if used) and store it in an approved plant storage location

2. If use of the SCS is not required, attach a drain line to the HI-TRAC and drain the remaining water from the annulus to the spent fuel pool or the plant liquid radwaste system.
3. Install HI-TRAC top lid as follows:

Warning:

When traversing the MPC with the HI-TRAC top lid using non-single-failure proof (or equivalent safety factors), the lid shall be kept less than 2 feet above the top surface of the MPC. This is performed to protect the MPC lid from a potential lid drop.

- a. Install HI-TRAC top lid. Inspect the bolts for general condition. Replace worn or damaged bolts with new bolts.
 - b. Install and torque the top lid bolts. See Table 8.1.5 for torque requirements.
 - c. Inspect the lift cleat bolts for general condition. Replace worn or damaged bolts with new bolts.
 - d. Install the MPC lift cleats and MPC slings. See Figure 8.1.24 and 8.1.25. See Table 8.1.5 for torque requirements.
 - e. Drain and remove the Temporary Shield Ring, if used.
4. Replace the pool lid with the transfer lid as follows (Not required for HI-TRAC 125D):

ALARA Note:

The transfer slide is used to perform the bottom lid replacement and eliminate the possibility of directly exposing the bottom of the MPC. The transfer slide consists of the guide rails, rollers, transfer step and carriage. The transfer slide carriage and jacks are powered and operated by remote control. The carriage consists of short-stroke hydraulic jacks that raise the carriage to support the weight of the bottom lid. The transfer step produces a tight level seam between the transfer lid and the pool lid to minimize radiation streaming. The transfer slide jacks do not have sufficient lift capability to support the entire weight of the HI-TRAC. This was selected specifically to limit floor loads. Users should designate a specific area that has sufficient room and support for performing this operation.

Note:

The following steps are performed to pretension the MPC slings.

- a. Lower the lift yoke and attach the MPC slings to the lift yoke. See Figure 8.1.25.
- b. Raise the lift yoke and engage the lift yoke to the HI-TRAC lifting trunnions.
- c. If necessary, position the transfer step and transfer lid adjacent to one another on the transfer slide carriage. See Figure 8.1.26. See Figure 8.1.9 for transfer step rigging.
- d. Deleted.
- e. Position HI-TRAC with the pool lid centered over the transfer step approximately one inch above the transfer step.

- f. Raise the transfer slide carriage so the transfer step is supporting the pool lid bottom. Remove the bottom lid bolts and store them temporarily.

ALARA Warning:

Clear all personnel away from the immediate operations area. The transfer slide carriage and jacks are remotely operated. The carriage has fine adjustment features to allow precise positioning of the lids.

- g. Lower the transfer carriage and position the transfer lid under HI-TRAC.
- h. Raise the transfer slide carriage to place the transfer lid against the HI-TRAC bottom lid bolting flange.
- i. Inspect the transfer lid bolts for general condition. Replace worn or damaged bolts with new bolts.
- j. Install the transfer lid bolts. See Table 8.1.5 for torque requirements.
- k. Raise and remove the HI-TRAC from the transfer slide.
- l. Disconnect the MPC slings and store them in an approved plant storage location.

Note:

HI-STORM receipt inspection and preparation may be performed independent of procedural sequence.

5. Perform a HI-STORM receipt inspection and cleanliness inspection in accordance with a site-approved inspection checklist, if required. See Figure 8.1.27 for HI-STORM lid rigging.

Note:

MPC transfer may be performed in the truck bay area, at the ISFSI, or any other location deemed appropriate by the licensee. The following steps describe the general transfer operations (See Figure 8.1.28). The HI-STORM may be positioned on an air pad, roller skid in the cask receiving area or at the ISFSI. The HI-STORM or HI-TRAC may be transferred to the ISFSI using a heavy haul transfer trailer, special transporter or other equipment specifically designed for such a function (See Figure 8.1.29) as long as the HI-TRAC and HI-STORM lifting requirements are not exceeded. The licensee is responsible for assessing and controlling floor loading conditions during the MPC transfer operations. Installation of the lid, vent screen, and other components may vary according to the cask movement methods and location of MPC transfer.

8.1.7 Placement of HI-STORM into Storage

1. Position an empty HI-STORM module at the designated MPC transfer location. The HI-STORM may be positioned on the ground, on a de-energized air pad, on a roller skid, on a flatbed trailer or other special device designed for such purposes. If necessary, remove the exit vent screens and gamma shield cross plates, temperature elements and the HI-STORM lid. See Figure 8.1.28 for some of the various MPC transfer options.

- a. Rinse off any road dirt with water. Inspect all cavity locations for foreign objects. Remove any foreign objects.
 - b. Transfer the HI-TRAC to the MPC transfer location.
2. De-energize the air pad or chock the vehicle wheels to prevent movement of the HI-STORM during MPC transfer and to maintain level, as required.

ALARA Note:

The HI-STORM vent duct shield inserts eliminate the streaming path created when the MPC is transferred past the exit vent ducts. Vent duct shield inserts are not used with the HI-STORM 100S.

3. Install the alignment device (or mating device for HI-TRAC 125D) and if necessary, install the HI-STORM vent duct shield inserts. See Figure 8.1.30.

Caution:

For MPCs with high burn-up fuel requiring supplemental cooling, the time to complete the transfer may be limited to prevent fuel cladding temperatures in excess of ISG-11 Rev. 3 limits. (See Section 4.5) All preparatory work related to the transfer should be completed prior to terminating the supplemental cooling operations.

4. If used, discontinue the supplemental cooling operations and disconnect the SCS. Drain water from the HI-TRAC annulus to an appropriate plant discharge point.
5. Position HI-TRAC above HI-STORM. See Figure 8.1.28.
6. Align HI-TRAC over HI-STORM (See Figure 8.1.31) and mate the overpacks.
7. If necessary, attach the MPC Downloader. See Figure 8.1.32.
8. Attach the MPC slings to the MPC lift cleats.
9. Raise the MPC slightly to remove the weight of the MPC from the transfer lid doors (or pool lid for HI-TRAC 125D and mating device)
10. If using the HI-TRAC 125D, unbolt the pool lid from the HI-TRAC.
11. Remove the transfer lid door (or mating device drawer) locking pins and open the doors (or drawer).

ALARA Warning:

MPC trim plates are used to eliminate the streaming path above and below the doors (or drawer). If trim plates are not used, personnel should remain clear of the immediate door area during MPC downloading since there may be some radiation streaming during MPC raising and lowering operations.

12. At the user's discretion, install trim plates to cover the gap above and below the door/drawer. The trim plates may be secured using hand clamps or any other method deemed suitable by the user. See Figure 8.1.33.
13. Lower the MPC into HI-STORM.
14. Disconnect the slings from the MPC lifting device and lower them onto the MPC lid.

15. Remove the trim plates (if used), and close the doors (or mating device drawer)

ALARA Warning:

Personnel should remain clear (to the maximum extent practicable) of the HI-STORM annulus when HI-TRAC is removed due to radiation streaming.

Note:

It may be necessary, due to site-specific circumstances, to move HI-STORM from under the empty HI-TRAC to install the HI-STORM lid, while inside the Part 50 facility. In these cases, users shall evaluate the specifics of their movements within the requirements of their Part 50 license.

16. Remove HI-TRAC from on top of HI-STORM.
17. Remove the MPC lift cleats and MPC slings and install hole plugs in the empty MPC bolt holes. See Table 8.1.5 for torque requirements.
18. Place HI-STORM in storage as follows:
- Remove the alignment device (mating device with HI-TRAC pool lid for HI-TRAC 125D) and vent duct shield inserts (if used). See Figure 8.1.30.
 - Inspect the HI-STORM lid studs and nuts for general condition. Replace worn or damaged components with new ones.
 - If used, inspect the HI-STORM 100A anchor components for general condition. Replace worn or damaged components with new ones.
 - Deleted.

Warning:

Unless the lift is single failure proof (or equivalent safety factor) for the HI-STORM Lid, the lid shall be kept less than 2 feet above the top surface of the overpack. This is performed to protect the MPC lid from a potential HI-STORM 100 lid drop.

Note:

Shims may be used on the HI-STORM 100 lid studs. If used, the shims shall be positioned to ensure a radial gap of less than 1/8 inch around each stud. The method of cask movement will determine the most effective sequence for vent screen, lid, temperature element, and vent gamma shield cross plate installation.

- Install the HI-STORM lid and the lid studs and nuts. See Table 8.1.5 for bolting requirements. Install the HI-STORM 100 lid stud shims if necessary. See Figure 8.1.27 for rigging.
- Install the HI-STORM exit vent gamma shield cross plates, temperature elements (if used) and vent screens. See Table 8.1.5 for torque requirements. See Figure 8.1.34a and 8.1.34b.
- Remove the HI-STORM lid lifting device and install the hole plugs in the empty holes. Store the lifting device in an approved plant storage location. See Table 8.1.5 for torque requirements.

- h. Secure HI-STORM to the transporter device as necessary.
- 19. Perform a transport route walkdown to ensure that the cask transport conditions are met.
- 20. Transfer the HI-STORM to its designated storage location at the appropriate pitch. See Figure 8.1.35.

Note:

Any jacking system shall have the provisions to ensure uniform loading of all four jacks during the lifting operation.

- a. If air pads were used, insert the HI-STORM lifting jacks and raise HI-STORM. See Figure 8.1.36. Remove the air pad.
- b. Lower and remove the HI-STORM lifting jacks, if used.
- c. For HI-STORM 100A overpack (anchored), perform the following:
 - 1. Inspect the anchor stud receptacles and verify that they are clean and ready for receipt of the anchor hardware.
 - 2. Align the overpack over the anchor location.
 - 3. Lower the overpack to the ground while adjusting for alignment.
 - 4. Install the anchor connecting hardware (See Table 8.1.5 for torque requirements).
- 21. Install the HI-STORM inlet vent gamma shield cross plates and vent screens. See Table 8.1.5 for torque requirements. See Figure 8.1.34.
- 22. Perform shielding effectiveness testing.
- 23. Perform an air temperature rise test as follows for the first HI-STORM 100 System placed in service:

Note:

The air temperature rise test shall be performed between 5 and 7 days after installation of the HI-STORM 100 lid to allow thermal conditions to stabilize. The purpose of this test is to confirm the initial performance of the HI-STORM 100 ventilation system.

- a. Measure the inlet air (or screen surface) temperature at the center of each of the four vent screens. Determine the average inlet air (or surface screen) temperature.
- b. Measure the outlet air (or screen surface) temperature at the center of each of the four vent screens. Determine the average outlet air (or surface screen) temperature.
- c. Determine the average air temperature rise by subtracting the results of the average inlet screen temperature from the average outlet screen temperature.
- d. Report the results to the certificate holder.

Table 8.1.1
ESTIMATED HANDLING WEIGHTS OF HI-STORM 100 SYSTEM COMPONENTS
125-TON HI-TRAC**

Component	MPC-24 (Lbs.)	MPC-32 (Lbs.)	MPC-68 (Lbs.)	Case† Applicability					
				1	2	3	4	5	6
Empty HI-STORM 100 overpack (without lid)††	245,040	245,040	245,040						1
HI-STORM 100 lid (without rigging)	23,963	23,963	23,963						1
Empty HI-STORM 100S (Short) overpack (without lid)††	275,000	275,000	275,000						1
Empty HI-STORM 100S (Tall) overpack (without lid)††	290,000	290,000	290,000						1
HI-STORM 100S lid (without rigging. Add 1,000 lbs for 100S Version B Lid)	28,000	28,000	28,000						1
Empty MPC (without lid or closure ring including drain line)	29,845	24,503	29,302	1	1	1	1	1	1
MPC lid (without fuel spacers or drain line)	9,677	9,677	10,194	1	1	1	1	1	1
MPC Closure Ring	145	145	145			1	1	1	1
Fuel (design basis)	40,320 41,280	53,760 55,040	47,600 49,640	1	1	1	1	1	1
Damaged Fuel Container (Dresden 1)	0	0	150						
Damaged Fuel Container (Humboldt Bay)	0	0	120						
MPC water (with fuel in MPC)	17,630	17,630	16,957	1	1				
Annulus Water	256	256	256	1	1				
HI-TRAC Lift Yoke (with slings)	4,200	4,200	4,200	1	1	1			
Annulus Seal	50	50	50	1	1				
Lid Retention System	2,300	2,300	2,300						
Transfer frame	6,700	6,700	6,700						1
Mating Device	15,000	15,000	15,000						
Empty HI-TRAC 125 (without Top Lid, neutron shield jacket water, or bottom lids)	117,803	117,803	117,803	1	1	1			1
Empty HI-TRAC 125D (without Top Lid, neutron shield jacket water, or bottom lids)	122,400	122,400	122,400	1	1	1			1
HI-TRAC 125 Top Lid	2,745	2,745	2,745			1			1
HI-TRAC 125D Top Lid	2,645	2,645	2,645			1			1
Optional HI-TRAC Lid Spacer (weight lbs/in thickness)	400	400	400						
HI-TRAC 125/125D Pool Lid (with bolts)	11,900	11,900	11,900	1	1				
HI-TRAC Transfer Lid (with bolts) (125 Only)	23,437	23,437	23,437			1			1
HI-TRAC 125 Neutron Shield Jacket Water	8,281	8,281	8,281		1	1			1
HI-TRAC 125 D Neutron Shield Jacket Water	9,000	9,000	9,000		1	1			1
MPC Stays (total of 2)	200	200	200						
MPC Lift Cleat	480	480	480			1	1		1

** Actual component weights are dependant upon as-built dimensions. The values provided herein are estimated. FSAR analyses use bounding values provided elsewhere. Users are responsible for ensuring lifted loads meet site capabilities and requirements.

† See Table 8.1.2 for a description of each load handling case.

†† Short refers to both 100S-232 and 100S Version B-219. Tall refers to both 100S-243 and 100S Version B-229. Weights are based on 200 lb/cf concrete. Add an additional 1955 lbs. for the HI-STORM 100A overpack.

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**TABLE 8.1.2
ESTIMATED HANDLING WEIGHTS
125-TON HI-TRAC****

Caution:

The maximum weight supported by the 125-Ton HI-TRAC lifting trunnions cannot exceed 250,000 lbs. Users must take actions to ensure that this limit is not exceeded.

Note:

The weight of the fuel spacers and the damaged fuel container are less than the weight of the design basis fuel assembly for each MPC and are therefore not included in the maximum handling weight calculations. Fuel spacers are determined to be the maximum combination weight of fuel + spacer. Users should determine their specific handling weights based on the MPC contents and the expected handling modes.

Case No.	Load Handling Evolution	Weight (lbs)		
		MPC-24	MPC-32	MPC-68
1	Loaded HI-TRAC 125 removal from spent fuel pool (neutron tank empty)	232,641 231,700	241,059 239,700	240,302 238,200
2	Loaded HI-TRAC 125 removal from spent fuel pool (neutron tank full)	240,992 239,900	249,340 248,000	248,583 246,500
3	Loaded HI-TRAC 125 During Movement through Hatchway	237,893 236,900	246,311 244,700	246,227 244,100
1A	Loaded HI-TRAC 125D removal from spent fuel pool (neutron tank empty)	237,238 236,400	245,656 244,500	244,899 243,000
2A	Loaded HI-TRAC 125D removal from spent fuel pool (neutron tank full)	246,238 245,400	254,656 253,500	253,899 252,000
3A	Loaded HI-TRAC 125D During Movement through Hatchway	231,572 230,900	239,990 238,700	239,906 238,100
4	MPC during transfer operations	81,427 80,467	89,595 88,315	89,761 87,721
5A	Loaded HI-STORM 100 in storage (See Second Note to Table 8.1.1)	349,950 348,990	358,368 357,088	358,284 356,244
5B	Loaded HI-STORM 100S (Short) in storage (See Second Note to Table 8.1.1)	383,947 380,500	392,365 388,600	392,281 387,800
5C	Loaded HI-STORM 100S (Tall) in storage (See Second Note to Table 8.1.1)	398,947 395,500	407,365 403,600	407,281 402,800
6	Loaded HI-TRAC and transfer frame during on site handling	240,393 239,434	248,811 247,282	248,727 246,688

** Actual component weights are dependant upon as-built dimensions. The values provided herein are estimated. FSAR analyses use bounding values provided elsewhere. Users are responsible for ensuring lifted loads meet site capabilities and requirements.

Table 8.1.3
ESTIMATED HANDLING WEIGHTS OF HI-STORM 100 SYSTEM COMPONENTS 100-
TON HI-TRAC**

Component	MPC-24 (Lbs.)	MPC-32 (Lbs.)	MPC-68 (Lbs.)	Case† Applicability					
				1	2	3	4	5	6
Empty HI-STORM 100 overpack (without lid)††	245,040	245,040	245,040					1	
HI-STORM 100 lid (without rigging)	23,963	23,963	23,963					1	
Empty HI-STORM 100S (Short) overpack (without lid)††	275,000	275,000	275,000					1	
Empty HI-STORM 100S (Tall) overpack (without lid)††	290,000	290,000	290,000					1	
HI-STORM 100S lid (without rigging, add 1,000 lbs for 100S Version B Lid)	28,000	28,000	28,000						
Empty MPC (without lid or closure ring including drain line)	29,845	24,503	29,302	1	1	1	1	1	1
MPC lid (without fuel spacers or drain line)	9,677	9,677	10,194	1	1	1	1	1	1
MPC Closure Ring	145	145	145			1	1	1	1
Fuel (design basis)	40,320 41,280	53,760 55,040	47,600 49,640	1	1	1	1	1	1
Damaged Fuel Container (Dresden 1)	0	0	150						
Damaged Fuel Container (Humboldt Bay)	0	0	120						
MPC water (with fuel in MPC)	17,630	17,630	16,957	1	1				
Annulus Water	256	256	256	1	1				
HI-TRAC Lift Yoke (with slings)	3,200	3,200	3,200	1	1	1			
Annulus Seal	50	50	50	1	1				
Lid Retention System	2,300	2,300	2,300						
Transfer frame	6,700	6,700	6,700						1
Empty HI-TRAC (without Top Lid, neutron shield jacket water, or bottom lids)	84,003	84,003	84,003	1	1	1			1
HI-TRAC Top Lid	1,189	1,189	1,189			1			1
HI-TRAC Pool Lid	7,863	7,863	7,863	1	1				
HI-TRAC Transfer Lid	16,686	16,686	16,686			1			1
HI-TRAC Neutron Shield Jacket Water	7,583	7,583	7,583		1	1			1
MPC Stays (total of 2)	200	200	200						
MPC Lift Cleat	480	480	480					1	1

** Actual component weights are dependant upon as-built dimensions. The values provided herein are estimated. FSAR analyses use bounding values provided elsewhere. Users are responsible for ensuring lifted loads meet site capabilities and requirements.

† See Table 8.1.4 for a description of each load handling case.

†† Short refers to both 100S-232 and 100S Version B-219. Tall refers to both 100S-243 and 100S Version B-229. Weights are based on 200 lb/cf concrete. Add an additional 1955 lbs. for the HI-STORM 100A overpack.

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Table 8.1.4
ESTIMATED HANDLING WEIGHTS
100-TON HI-TRAC**

Caution:
 The maximum weight supported by the 100-Ton HI-TRAC lifting trunnions cannot exceed 200,000 lbs. Users must take actions to ensure that this limit is not exceeded.

Note:
 The weight of the fuel spacers and the damaged fuel container are less than the weight of the design basis fuel assembly and therefore not included in the maximum handling weight calculations. Fuel spacers are determined to be the maximum combination weight of fuel + spacer. Users should determine the handling weights based on the contents to be loaded and the expected mode of operations.

Case No.	Load Handling Evolution	Weight (lbs)		
		MPC-24	MPC-32	MPC-68
1	Loaded HI-TRAC removal from spent fuel pool (neutron tank empty)	193,804	202,222	201,465
		192,844	200,942	199,425
2	Loaded HI-TRAC removal from spent fuel pool (neutron tank full)	201,387	209,805	209,048
		200,427	208,525	207,008
3	Loaded HI-TRAC During Movement through Hatchway	194,088	202,506	202,422
		192,647	200,745	199,904
4	MPC during transfer operations	81,427	89,845	89,761
		80,467	88,565	87,724
5A	Loaded HI-STORM 100 in storage (See Second Note to Table 8.1.1)	349,950	358,368	358,284
		348,990	357,088	356,244
5B	Loaded HI-STORM 100S (Short) in storage (See Second Note to Table 8.1.1)	383,947	392,365	392,281
		380,500	388,600	387,800
5C	Loaded HI-STORM 100S (Tall) in storage (See Second Note to Table 8.1.1)	398,947	407,365	407,281
		395,500	403,600	402,800
6	Loaded HI-TRAC and transfer frame during on site handling	197,588	206,006	205,922
		196,627	204,725	203,884

** Actual component weights are dependant upon as-built dimensions. The values provided herein are estimated. FSAR analyses use bounding values provided elsewhere. Users are responsible for ensuring lifted loads meet site capabilities and requirements.

Table 8.1.5
HI-STORM 100 SYSTEM TORQUE REQUIREMENTS

Fastener [†]	Torque (ft-lbs) ^{††}	Pattern ^{†††}
HI-TRAC Top Lid Bolts [†]	Hand tight	None
HI-TRAC Pool Lid Bolts (36 Bolt Lid) [†]	58 ft-lbs	Figure 8.1.37
HI-TRAC Pool Lid Bolts (16 Bolt Lid) [†]	110 ft-lbs	Figure 8.1.37
100-Ton HI-TRAC Transfer Lid Bolts [†]	203 ft-lbs	Figure 8.1.37
125-Ton HI-TRAC Transfer Lid Bolts [†]	270 ft-lbs	Figure 8.1.37
MPC Lift Cleats Stud Nuts [†]	793 ft-lbs	None
MPC Lift Hole Plugs [†]	Hand tight	None
Threaded Fuel Spacers	Hand Tight	None
HI-STORM Lid Nuts [†]	100 ft-lbs	None
HI-STORM 100S Lid Nuts [†] (Temporary and Permanent Lids, Including Version B)	Hand Tight	None
Door Locking Pins	Hand Tight + 1/8 to 1/2 turn	None
HI-STORM 100 Vent Screen/Temperature Element Screws	Hand Tight	None
HI-STORM 100A Anchor Studs	55- 65 ksi tension applied by bolt tensioner (no initial torque)	None

† Studs and nuts shall be cleaned and inspected for damage or excessive thread wear (replace if necessary) and coated with a light layer of Fel-Pro Chemical Products, N-5000, Nuclear Grade Lubricant (or equivalent).

†† Unless specifically specified, torques have a +/- 5% tolerance.

††† No de-torquing pattern is needed.

Table 8.1.6
HI-STORM 100 SYSTEM ANCILLARY EQUIPMENT OPERATIONAL DESCRIPTION

Equipment	Important To Safety Classification	Reference Figure	Description
Air Pads/Rollers	Not Important To Safety	8.1.29	Used for HI-STORM or HI-TRAC cask positioning. May be used in conjunction with the cask transporter or other HI-STORM 100 or HI-TRAC lifting device.
Annulus Overpressure System	Not Important To Safety	8.1.14	The Annulus Overpressure System is used for protection against spent fuel pool water contamination of the external MPC shell and baseplate surfaces by providing a slight annulus overpressure during in-pool operations.
Annulus Shield	Not Important To Safety	8.1.13	A shield that is placed at the top of the HI-TRAC annulus to provide supplemental shielding to the operators performing cask loading and closure operations.
Automated Welding System	Not Important To Safety	8.1.2b	Used for remote field welding of the MPC.
AWS Baseplate Shield	Not Important To Safety	8.1.2b	Provides supplemental shielding to the operators during the cask closure operations.
Bottom Lid Transfer Slide (Not used with HI-TRAC 125D)	Not Important To Safety	8.1.26	Used to simultaneously replace the pool lid with the transfer lid under the suspended HI-TRAC and MPC. Used in conjunction with the bottom lid transfer step.
Cask Transporter	Not Important to Safety unless site-specific conditions require transfer cask or overpack handling outside drop analysis basis.	8.1.29a and 8.1.29b	Used for handling of the HI-STORM 100 Overpack and/or the HI-TRAC Transfer Cask around the site. The cask transporter may take the form of heavy haul transfer trailer, special transporter or other equipment specifically designed for such a function.
Cool-Down System	Not Important To Safety	8.3.4	A closed-loop forced ventilation cooling system used to gas-cool the MPC fuel assemblies down to a temperature at which water can be introduced without the risk of uncontrolled pressure transients in the MPC due to flashing or thermally shocking the fuel assemblies. The cool-down system is attached between the MPC drain and vent ports. The cool-down system is used only for unloading operations.

† Figures are representative and may not depict all configurations for all users.

Table 8.1.6
 HI-STORM 100 SYSTEM ANCILLARY EQUIPMENT OPERATIONAL DESCRIPTION
 (Continued)

Equipment	Important To Safety Classification	Reference Figure	Description
Lid and empty component lifting rigging	Not Important To Safety, Rigging shall be provided in accordance with NUREG 0612	8.1.9	Used for rigging such components such as the HI-TRAC top lid, pool lid, MPC lid, transfer lid, AWS, HI-STORM Lid and auxiliary shielding and the empty MPC.
Helium Backfill System	Not Important To Safety	8.1.23	Used for controlled insertion of helium into the MPC for leakage testing, blowdown and placement into storage.
HI-STORM 100 Lifting Jacks	Not Important To Safety	8.1.36	Jack system used for lifting the HI-STORM overpack to provide clearance for inserting or removing a device for transportation.
Alignment Device	Not Important To Safety	8.1.31	Guides HI-TRAC into place on top of HI-STORM for MPC transfers. (Not used for HI-TRAC 125D)
HI-STORM Lifting Devices	Determined site-specifically based on type, location, and height of lift being performed. Lifting devices shall be provided in accordance with ANSI N14.6.	Not shown.	A special lifting device used for connecting the crane (or other primary lifting device) to the HI-STORM 100 for cask handling. Does not include the crane hook (or other primary lifting device) device.
HI-STORM Vent Duct Shield Inserts	Important to Safety Category C.	8.1.30	Used for prevention of radiation streaming from the HI-STORM 100 exit vents during MPC transfers to and from HI-STORM. Not used with the HI-STORM 100S.
HI-TRAC Lid Spacer	Spacer Ring is Not-Important-To-Safety, Studs or bolts are Important to Safety Category B	Not Shown	Optional ancillary which is used during MPC transfer operations to increase the clearance between the top of the MPC and the underside of the HI-TRAC top lid. Longer threaded studs (or bolts), supplied with the lid spacer, replace the standard threaded studs (or bolts) supplied with the HI-TRAC. The HI-TRAC lid spacer may ONLY be used when the HI-TRAC is handled in the vertical orientation or if HI-TRAC transfer lid is NOT used. The height of the spacer shall be limited to ensure that the weights and C.G. heights in a loaded HI-TRAC with the spacer do not exceed the bounding values found in Section 3.2 of the FSAR.
HI-TRAC Lift Yoke/Lifting Links	Determined site-specifically based on type and location, and height of lift being performed. Lift yoke and lifting devices for loaded HI-TRAC handling shall be provided in accordance with ANSI N14.6.	8.1.3	Used for connecting the crane (or other primary lifting device) to the HI-TRAC for cask handling. Does not include the crane hook (or other primary lifting device).

† Figures are representative and may not depict all configurations for all users.

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Table 8.1.6
HI-STORM 100 SYSTEM ANCILLARY EQUIPMENT OPERATIONAL DESCRIPTION
 (Continued)

Equipment	Important To Safety Classification	Reference Figure [†]	Description
HI-TRAC transfer frame	Not Important To Safety	8.1.4	A steel frame used to support HI-TRAC during delivery, on-site movement and upending/downending operations.
Cask Primary Lifting Device (Cask Transfer Facility)	Important to Safety. Quality classification of subcomponents determined site-specifically.	8.1.28 and 8.1.32	Optional auxiliary (Non-Part 50) cask lifting device(s) used for cask upending and downending and HI-TRAC raising for positioning on top of HI-STORM to allow MPC transfer. The device may consist of a crane, lifting platform, gantry system or any other suitable device used for such purpose.
Inflatable Annulus Seal	Not Important To Safety	8.1.13	Used to prevent spent fuel pool water from contaminating the external MPC shell and baseplate surfaces during in-pool operations.
Lid Retention System	Important to Safety Status determined by each licensee. MPC lid lifting portions of the Lid Retention System shall meet the requirements of ANSI N14.6.	8.1.15, 8.1.17	Optional. The Lid Retention System secures the MPC lid in place during cask handling operations between the pool and decontamination pad.
MPC Lift Cleats	Important To Safety – Category A. MPC Lift Cleats shall be provided in accordance with of ANSI N14.6.	8.1.24	MPC lift cleats consist of the cleats and attachment hardware. The cleats are supplied as solid steel components that contain no welds. The MPC lift cleats are used to secure the MPC inside HI-TRAC during bottom lid replacement and support the MPC during MPC transfer from HI-TRAC into HI-STORM and vice versa. The ITS classification of the lifting device attached to the cleats may be lower than the cleat itself, as determined site-specifically.
Hydrostatic Test System	Not Important to Safety	8.1.20	Used to pressure test the MPC lid-to-shell weld.
MPC Downloader	Important To Safety status determined site-specifically. MPC Downloader Shall meet the requirements of CoC, Appendix B, Section 3.5.	8.1.28 and 8.1.32	A lifting device used to help raise and lower the MPC during MPC transfer operations to limit the lift force of the MPC against the top lid of HI-TRAC. The MPC downloader may take several forms depending on the location of MPC transfer and may be used in conjunction with other lifting devices.

[†] Figures are representative and may not depict all configurations for all users.

Table 8.1.6
 HI-STORM 100 SYSTEM ANCILLARY EQUIPMENT OPERATIONAL DESCRIPTION
 (Continued)

Equipment	Important To Safety Classification	Reference Figure [†]	Description
Deleted			
Deleted			
Mating Device	Important-To-Safety – Category B	8.1.31	Used to mate HI-TRAC 125D to HI-ST)RM during transfer operations. Includes sliding drawer for use in removing HI-TRAC pool lid.
MPC Support Slings	Important To Safety – Category A – Rigging shall be provided in accordance with NUREG 0612.	8.1.25	Used to secure the MPC to the lift yoke during HI-TRAC bottom lid replacement operations. Attaches between the MPC lift cleats and the lift yoke. Can be configured for different crane hook configuration.
MPC Upending Frame	Not Important to Safety	8.1.6	A steel frame used to evenly support the MPC during upending operations, and control the upending process.
Supplemental Cooling System	Important to Safety – Category B	2.C.1	A system used to circulate water or other coolant through the HI-TRAC annulus in order to maintain fuel cladding temperatures below ISG-11 Rev. 3 limits during operations with the MPC in the HI-TRAC. Required only for MPC containing high burn-up fuel as determined in accordance with Section 4.5.
<i>MSLD (Helium Leakage Detector)</i> Deleted	<i>Not Important to Safety</i>	<i>Not shown</i>	<i>Used for helium leakage testing of the MPC cover plate welds.</i>
Deleted			
Temporary Shield Ring	Not Important To Safety	8.1.18	A water-filled tank that fits on the cask neutron shield around the upper forging and provides supplemental shielding to personnel performing cask loading and closure operations.
Vacuum Drying (Moisture Removal) System	Not Important To Safety	8.1.22a	Used for removal of residual moisture from the MPC following water draining.
Forced Helium Dehydration System	Not Important To Safety	8.1.22b	Used for removal of residual moisture from the MPC following water draining.
Vent and Drain RVOAs	Not Important To Safety	8.1.16	Used to access the vent and drain ports. The vent and drain RVOAs allow the vent and drain ports to be operated like valves and prevent the need to hot tap into the penetrations during unloading operation.
Deleted			
Weld Removal	Not Important To Safety	8.3.2b	Semi-automated weld removal system used for removal of the MPC field weld to support

[†] Figures are representative and may not depict all configurations for all users.

System		unloading operations.
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Table 8.1.7
 HI-STORM 100 SYSTEM INSTRUMENTATION SUMMARY FOR LOADING AND
 UNLOADING OPERATIONS†

Instrument	Function
Contamination Survey Instruments	Monitors fixed and non-fixed contamination levels.
Dose Rate Monitors/Survey Equipment	Monitors dose rate and contamination levels and ensures proper function of shielding. Ensures assembly debris is not inadvertently removed from the spent fuel pool during overpack removal.
Flow Rate Monitor	Monitors fluid flow rate during various loading and unloading operations.
<i>Helium Mass Spectrometer Leakage Detector (MSLD)</i> Deleted	<i>Ensures leakage rates of welds are within acceptable limits</i>
Deleted	Ensures leakage rates of welds are within acceptance criteria.
Deleted	
Volumetric Examination Testing Rig	Used to assess the integrity of the MPC lid-to-shell weld.
Pressure Gauges	Ensures correct pressure during loading and unloading operations.
Temperature Gauges	Monitors the state of gas and water temperatures during closure and unloading operations.
Deleted	
Temperature Surface Pyrometer	For HI-STORM vent operability testing.
Vacuum Gages	Used for vacuum drying operations and to prepare an MPC evacuated sample bottle for MPC gas sampling for unloading operations.
Deleted	
Deleted	
Moisture Monitoring Instruments	Used to monitor the MPC moisture levels as part of the moisture removal system.

† All instruments require calibration. See figures at the end of this section for additional instruments, controllers and piping diagrams.

Table 8.1.8
HI-STORM 100 SYSTEM OVERPACK INSPECTION CHECKLIST

Note:

This checklist provides the basis for establishing a site-specific inspection checklist for the HI-STORM 100 overpack. Specific findings shall be brought to the attention of the appropriate site organizations for assessment, evaluation and potential corrective action prior to use.

HI-STORM 100 Overpack Lid:

1. Lid studs and nuts shall be inspected for general condition.
2. The painted surfaces shall be inspected for corrosion and chipped, cracked or blistered paint.
3. All lid surfaces shall be relatively free of dents, scratches, gouges or other damage.
4. The lid shall be inspected for the presence or availability of studs and nuts and hole plugs.
5. Lid lifting device/ holes shall be inspected for dirt and debris and thread condition.
6. Lid bolt holes shall be inspected for general condition.

HI-STORM 100 Main Body:

1. Lid bolt holes shall be inspected for dirt, debris, and thread condition.
2. Vents shall be free from obstructions.
3. Vent screens shall be available, intact, and free of holes and tears in the fabric.
4. The interior cavity shall be free of debris, litter, tools, and equipment.
5. Painted surfaces shall be inspected for corrosion, and chipped, cracked or blistered paint.
6. The nameplate shall be inspected for presence, legibility, and general condition and conformance to Quality Assurance records package.
7. Anchor hardware, if used, shall be checked for general condition.

Table 8.1.9
MPC INSPECTION CHECKLIST

Note:

This checklist provides the basis for establishing a site-specific inspection checklist for MPC. Specific findings shall be brought to the attention of the appropriate site organizations for assessment, evaluation and potential corrective action prior to use.

MPC Lid and Closure Ring:

1. The MPC lid and closure ring surfaces shall be relatively free of dents, gouges or other shipping damage.
2. The drain line shall be inspected for straightness, thread condition, and blockage.
3. Vent and Drain attachments shall be inspected for availability, thread condition operability and general condition.
4. Upper fuel spacers (if used) shall be inspected for availability and general condition. Plugs shall be available for non-used spacer locations.
5. Lower fuel spacers (if used) shall be inspected for availability and general condition.
6. Drain and vent port cover plates shall be inspected for availability and general condition.
7. Serial numbers shall be inspected for readability.

MPC Main Body:

1. All visible MPC body surfaces shall be inspected for dents, gouges or other shipping damage.
2. Fuel cell openings shall be inspected for debris, dents and general condition.
3. Lift lugs shall be inspected for general condition.
4. Verify proper MPC basket type for contents.

Table 8.1.10
HI-TRAC TRANSFER CASK INSPECTION CHECKLIST

Note:

This checklist provides the basis for establishing a site-specific inspection checklist for the HI-TRAC Transfer Cask. Specific findings shall be brought to the attention of the appropriate site organizations for assessment, evaluation and potential corrective action prior to use.

HI-TRAC Top Lid:

1. The painted surfaces shall be inspected for corrosion and chipped, cracked or blistered paint.
2. All Top Lid surfaces shall be relatively free of dents, scratches, gouges or other damage.

HI-TRAC Main Body:

1. The painted surfaces shall be inspected for corrosion, chipped, cracked or blistered paint.
2. The Top Lid bolt holes shall be inspected for dirt, debris and thread damage.
3. The Top Lid lift holes shall be inspected for thread condition.
4. Lifting trunnions shall be inspected for deformation, cracks, end plate damage, corrosion, excessive galling, damage to the locking plate, presence or availability of locking plate and end plate retention bolts.
5. Pocket trunnion, if used, recesses shall be inspected for indications of overstressing (i.e., cracks, deformation, and excessive wear).
6. Annulus inflatable seal groove shall be inspected for cleanliness, scratches, dents, gouges, sharp corners, burrs or any other condition that may damage the inflatable seal.
7. The nameplate shall be inspected for presence and general condition.
8. The neutron shield jacket shall be inspected for leaks.
9. Neutron shield jacket pressure relief valve shall be inspected for presence, and general condition.
10. The neutron shield jacket fill and drain plugs shall be inspected for presence, leaks, and general condition.
11. Bottom lid flange surface shall be clean and free of large scratches and gouges.

Table 8.1.10 (Continued)
HI-TRAC OVERPACK INSPECTION CHECKLIST

HI-TRAC Transfer Lid (Not used with HI-TRAC 125D):

1. The doors shall be inspected for smooth actuation.
2. The threads shall be inspected for general condition.
3. The bolts shall be inspected for indications of overstressing (i.e., cracks, deformation, thread damage, excessive wear) and replaced as necessary.
4. Door locking pins shall be inspected for indications of overstressing (i.e., cracks, and deformation, thread damage, excessive wear) and replaced as necessary.
5. Painted surfaces shall be inspected for corrosion and chipped, cracked or blistered paint.
6. Lifting holes shall be inspected for thread damage.

HI-TRAC Pool Lid:

1. Seal shall be inspected for cracks, breaks, cuts, excessive wear, flattening, and general condition.
2. Drain line shall be inspected for blockage and thread condition.
3. The lifting holes shall be inspected for thread damage.
4. The bolts shall be inspected for indications of overstressing (i.e., cracks and deformation, thread damage, and excessive wear).
5. Painted surfaces shall be inspected for corrosion and chipped, cracked or blistered paint.
6. Threads shall be inspected for indications of damage.