

Allen, William

From: Michael.Conroy@dot.gov
Sent: Wednesday, February 16, 2011 8:02 AM
To: Allen, William
Subject: RE: MFC-1 Rib Question

Chris - With regard to your question below, here is the response I have received from Areva,

"Here is a response from MNF. When TN receives the photos mentioned, we will pass them along.

Frankly speaking, we do not attach anything at the holes during transport in order to prevent the holes from being used for lifting because the MFC-1 is transported with a flat rack and the package is completely covered with a sheet and the clearance between the wall at both sides of flat rack and the end of the package is approximately 200 mm. Therefore we believe that 1) it is impossible for anyone to find the holes from the transport configuration, and 2) the clearance of this prevents anyone from accessing the hole during transport. We are preparing photos of the transport configuration and intend to explain with them."

From: Allen, William [<mailto:William.Allen@nrc.gov>]
Sent: Thursday, January 20, 2011 9:22 AM
To: Conroy, Michael (PHMSA)
Subject: MFC-1 Rib Question

Paragraph 608 in TS-R-1 reads as follows:

Attachments and any other features on the outer surface of the *package* which could be used to lift it shall be designed either to support its mass in accordance with the requirements of para. 607 or shall be removable or otherwise rendered incapable of being used during transport.

Figure I-C.6 shows two ribs attached to the lower container of the MFC-1. Each rib has a hole in it, and although there are no dimensions provided, the hole appears large enough to accommodate a rigging shackle. In my mind, this fact raises the possibility that, either through malicious intent, extreme stupidity or very bad luck, the rib could be used to lift the MFC-1. A review of the SAR did not reveal a structural evaluation of the rib which would enable me to adequately address paragraph 608 in TS-R-1. Is either a rod, a bar or some other object inserted through the hole in the rib during transport to minimize movement of the MFC-1?

Thanks, Chris