On: 30 July 2019 12:08,
"Morris, Scott" <Scott.Morris@nrc.gov> wrote:

Please get back to Mr. Langley; cc me. Also this all needs to go into ADAMS. I'm at ANO all day and don't have time to reply.

Thanks!

**From:** Charles Langley [mailto:langley@publicwatchdogs.org]
**Sent:** Monday, July 29, 2019 7:31 PM
**To:** Morris, Scott <Scott.Morris@nrc.gov>
**Subject:** [External_Sender] Re: "Redundant drop protection features" at SONGS

Thank you so much for the quick reply Mr. Morris. I'm still a bit confused. Logically, if they were using what you refer to below as "*two 100% redundant loading 'slings'* " then the fact that the two redundant slings were slack should have shown up on the VCT HMI screen, as cited below in the NRC's *Traditional Enforcement Panel Worksheet EA: 18-155*, dated 10/25/18.

**Question 1) Redundant Slings.** Did they (Edison or its contractor) even have redundant slings hanging loose inside the transfer casks at the time of the August 3 near-miss? Or, did they simply not equip the crews with redundant slings?

**Question 2) Real-Time Monitoring Equipment.** It appears from the NRC statement below that the VCT HMI screen is incapable of providing either *qualitative* or *quantitative* feedback. Is this correct? Has Edsion created a quantitative monitoring system?

This is what the "TRADITIONAL ENFORCEMENT PANEL WORKSHEET" (emphasis mine) says:

**NRC Comment:** There is no ***qualitative*** description provided for how to determine when the slings go "slack." There is a note before step 7.2.23 stating the "the load on the VCT HMI screen may be used to determine if the downloader slings are going slack." However, there is no ***quantitative*** description given for the VCT operator to read from the VCT HMI screen that indicates at which load, loss of load, or pressure indicates when the downloader slings are in a slack condition.

**Question 3) Radiation worker safety and training**. It is my understanding that radiation workers are often called "sponges" within the industry, because once they absorb a life-time dose of ionizing radiation, as indicated by some type of badge or dosimeter, they can never work around ionizing radiation legally again. Is this true?

The reason I am asking is because this requirement could of necessity create a perpetually high turnover rate for "spotters" that are in the cherry picker to monitor the download. My understanding is that these "spotters" must position themselves directly over the canister in the cherry picker and peek down into it, thus insuring a massive career-shortening dose. Is high

turnover of veteran radiation workers the reason that Holtec was using an inexperienced operator, or is it simply a matter of Holtec being unable or unwilling to hire qualified help?

Many thanks,

Charles Langley, Executive Director
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Public Watchdogs

On Mon, Jul 29, 2019 at 2:41 PM Morris, Scott <Scott.Morris@nrc.gov> wrote:
Dear Mr. Langley:

Thank you for the question. On March 25, 2019, the NRC cited Southern California Edison with a Severity Level II Violation, accompanied by a $116,000 civil penalty, precisely because the company *"failed to ensure that redundant load drop protection features were available to prevent uncontrolled lowering of the load during multi-purpose canister transfer operations"* during the August 3, 2018 incident at San Onofre. Specifically, both of the two 100% redundant loading "slings" were disabled when a loaded used fuel canister became lodged on a shield ring inside the ISFSI vault. Please see the Notice of Violation attached to my letter to Mr. Doug Bauder at:

https://www.nrc.gov/docs/ML1908/ML19080A208.pdf

Edison has implemented numerous corrective measures expressly designed to ensure that the August 3 incident is not repeated. The NRC staff has conducted extensive inspections of these corrective actions and continues to provide active on-site oversight of Edison's fuel transfer operations.

I have also forwarded your question to our technical and enforcement staff here in the regional office for their awareness.

Best Regards,

***Scott A. Morris***
Regional Administrator

**U.S. Nuclear Regulatory Commission / Region IV**
| E-mail: scott.morris@nrc.gov| ☎ Office: (817) 200-1225 |

**From:** Charles Langley <langley@publicwatchdogs.org>
**Sent:** Monday, July 29, 2019 12:32 PM
**To:** Morris, Scott <Scott.Morris@nrc.gov>
**Subject:** [External_Sender] "Redundant drop protection features" at SONGS

Dear Mr. Morris,

I was just browsing through NRC Form 651 for SONGS ISFSI dated Certificate # 1040, *Certificate of Compliance For Spent Fuel Storage Casks, Supplemental Sheet, CoC 1040 Appendix A Tech Spec, Item 5.2.c.3*, and happened to notice that in regards to the Holtec MPC downloading process, "**The lifting equipment shall have redundant drop protection features which prevent uncontrolled lowering of the load."** (see Item 5.2.c.3 highlighted below).

Has Holtec or Edsion provided redundant drop protection during the downloading process? I haven't seen any mention of it in the news reports, press releases, or NRC documents. Was this detail overlooked?

**CoC 1040 Appendix A Tech Spec 5.2.c.3**



5.0 ADMINISTRATIVE CONTROLS AND PROGRAMS (continued)

5.2 Transport Evaluation Program

a. For lifting of the loaded MPC or TRANSFER CASK using equipment which is integral to a structure governed by 10 CFR Part 50 regulations, 10 CFR 50 requirements apply.

b. This program is not applicable when the TRANSFER CASK is in the FUEL BUILDING or is being handled by equipment providing support from underneath (i.e., on a rail car, heavy haul trailer, air pads, etc...).

c. The TRANSFER CASK when loaded with spent fuel, may be lifted to and carried at any height necessary during TRANSPORT OPERATIONS and MPC TRANSFER, provided the lifting equipment is designed in accordance with items 1, 2, and 3 below.

1. The metal body and any vertical columns of the lifting equipment shall be designed to comply with stress limits of ASME Section III, Subsection NF, Class 3 for linear structures. All vertical compression loaded primary members shall satisfy the buckling criteria of ASME Section III, Subsection NF.

2. The horizontal cross beam and any lifting attachments used to connect the load to the lifting equipment shall be designed, fabricated, operated, tested, inspected, and maintained in accordance with applicable sections and guidance of NUREG-0612, Section 5.1. This includes applicable stress limits from ANSI N14.6.

3. The lifting equipment shall have redundant drop protection features which prevent uncontrolled lowering of the load.



Thank you so much.

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