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# PUBLIC SUBMISSION

**Docket:** NRC-2021-0096  
Control of Heavy Loads at Nuclear Facilities

**Comment On:** NRC-2021-0096-0001  
Control of Heavy Loads at Nuclear Facilities; Public Comment Period Extended

**Document:** NRC-2021-0096-DRAFT-0004  
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## General Comment

Please refer to attached file "Duerr Comments on NRC DG-1381.docx."

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## Attachments

Duerr Comments on NRC DG-1381

## **Comments on NRC Draft Regulatory Guide DG-1381**

The following comments are based on the draft issued April 2021.

Page 5, third bullet point – ASME BTH-1-2020 defines the term “lifting attachment” as “a load-supporting device, such as a lifting lug, padeye, trunnion or similar appurtenance that is attached to the lifted load, is designed for use with the specific load to which it is attached, and either (a) remains attached to the load, or (b) is removed and not reused.” It is suggested that the term “lifting attachment,” as opposed to the present term “load lifting attachment” be used here and elsewhere throughout this guide to provide improved clarity and consistency with ASME BTH-1.

Page 11, paragraph (3) – The term “load attachment points” is used. The term “lifting attachment” is preferred, as discussed in the comment above.

Page 12, paragraph (3) – The current edition of ASME BTH-1 is 2020.

Page 12, paragraphs (3) and (3c) – The term “load attachment points” is used in these two locations. The term “lifting attachment” is preferred, as discussed in the comment above.

Page 15, reference 3 – The current edition of ASME BTH-1 is 2020, issued on June 11, 2021.

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