# Exelon Dry Cask Storage Program 2012 Campaign Summary

Kevin P. Donovan, PE NEI Used Fuel Management Conference



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#### **Exelon 2012 Spent Fuel Loading Campaign Summary**

|                    | Campaign Size |      |           |               |
|--------------------|---------------|------|-----------|---------------|
| Site               | Casks         | Fuel | Cask Type | Dose / Goal   |
| Byron (PWR)        | 8             | 256  | MPC-32    | 1.509 / 1.818 |
| Dresden (BWR)      | 4             | 272  | MPC-68    | 2.070 / 2.595 |
| Limerick (BWR)     | 3             | 183  | 61BT      | 1.270 / 1.519 |
| Oyster Creek (BWR) | 4             | 244  | 61BTH     | 1.382 / 1.560 |
| Peach Bottom (BWR) | 6             | 408  | TN-68     | 1.559 / 1.492 |
| Total              | 25            | 1363 |           |               |

Limerick also installed 19 HSM-H horizontal storage modules on existing pad



#### Lessons Learned – Human Performance

- Significance Level 3 Human Performance (HU) Issues
  - Supplemental Engineer performed work for which they were not qualified
  - Errors discovered on (supplemental workforce) inspection reports that put into question the operability of loaded canister(s)
  - FME L3 event (loss of FME control) when supplemental worker dropped setscrew
  - Supplemental Work Planner performed work for which they were not qualified
  - Supplemental worker injured finger (OSHA Recordable) during crane disassembly
- Lessons Learned / Corrective Actions
  - Supplemental Engineers need to be supervised by Engineering Management
    - All DCS supplemental Engineering resources are now assigned to a site Engineering workgroup
  - Supplemental workforce may not have developed the same commitment to flawless execution as longer-term utility employees. A multi-faceted approach to improving performance of supplemental workforce is required.
    - Incentives / penalties built into contracts
    - Participation in supplemental workforce HU training
    - Dedicated Task Manager to focus specifically on supplemental workforce
    - · Oral Boards for company and supplemental supervision / oversight



### **Lessons Learned – Equipment Performance**

- Most Significant Equipment Performance Issues
  - Overhead Crane Performance
    - Byron load cell component failures (15 days to campaign start)
    - Dresden limit switch damage (20 days mid-campaign)
    - Oyster Creek overhead crane repairs (14 days to mobilization)
  - Spent Fuel / Refuel Bridge Performance
    - Byron post-modification test of control upgrades (5 days to campaign start)
    - Oyster Creek post-modification test of control upgrades (2 days to dry run)
  - Byron disruption of Helium supply (5 hours during processing)
  - Peach Bottom lift beam repair (14 days to campaign start)
- Lessons Learned / Corrective Actions
  - Established formal milestones for completion of inspections / preventive maintenance
  - Backed up milestone dates to ensure sufficient time to address discovery items
  - Established requirement for Maintenance to certify crane / bridge readiness
  - Strengthened Management challenge of equipment readiness at T-1 month review
  - On-site support by OEM for crane / bridge emergent repairs



### **Lessons Learned – HSM Installation**

- Limerick ISFSI pad sized for 94 DSCs / HSMs
  - Initial configuration of 24 HSMs established based on a belief that DOE would begin taking fuel after some delay past 1998
  - Installed an additional 19 HSMs in 2012
- Lessons Learned
  - Expansion by 19 (or to full capacity of 94) required additional analyses and physical changes
    - 10CFR20 dose analysis required assuming fully-populated to 94
    - Physical security changes to support expansion required
  - Sheer size and weight of HSMs requires use of transportation capabilities (rail) and heavy haulers not frequently exercised by site
  - Significantly more challenging from a coordination of workgroups perspective
    - Coordination with fabricator for transportation and delivery schedules
    - Coordination of constructor resources and heavy equipment
    - Coordination of security resources to establish compensatory measures and support access / egress of materials and haulers
  - Alignment of site resources to support: Operations, Engineering, Rad Protection, Security, Work Planning, Work Control



#### Work Hour Rule Considerations

• For our Holtec sites, we have expanded the per-cask cycle time to two weeks with weekends off

| Week1         | Sun | Mon | Tue | Wed | Thu | Fri | Sat |
|---------------|-----|-----|-----|-----|-----|-----|-----|
| Days          |     |     |     |     |     |     |     |
| Nights        |     |     |     |     |     |     |     |
|               |     |     |     |     |     |     |     |
| Maaka         | Sup | Mon | Tua | Wad | Thu |     | Set |
| Week2         | Sun | Mon | Tue | Wed | Thu | Fri | Sat |
| Week2<br>Days | Sun | Mon | Tue | Wed | Thu | Fri | Sat |



### Work Hour Rule Considerations (cont'd)

• For our Transnuclear sites, we have established a 5-day cycle time with weekends off

| Shift | Sun | Mon | Tue | Wed | Thu | Fri | Sat |
|-------|-----|-----|-----|-----|-----|-----|-----|
| Days  |     |     |     |     |     |     |     |
| Swing |     |     |     |     |     |     |     |
| Mids  |     |     |     |     |     |     |     |

• These approaches are compatible with the WHR plus provide flexibility for upsets



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