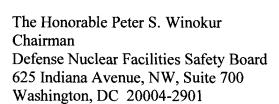


Department of Energy

Washington, DC 20585

February 25, 2011



Dear Mr. Chairman:

In the Defense Nuclear Facilities Safety Board's (Board) letter dated December 2, 2009, the Board requested to be kept apprised of the status of the Peer Review Teams' (PRT) efforts on a quarterly basis through a list of issues developed, their status, and resolution until all issues have been resolved.

The Structural and Equipment PRTs last met in Richland, Washington, in November 2010. These meetings were attended and observed by your staff. The peer review reports for each of the meetings are enclosed. The Structural PRT review included seven comments and two findings associated with the Pretreatment Facility Annex Building. The project is in the process of addressing both of these findings. The Equipment PRT review resulted in no findings and four comments.

The Equipment PRT report and the Structural PRT report are included as enclosures to this letter.

During the visit in November 2010, the Board's staff asked how commodity weights are being considered and tracked in the structural steel design. The inquiry is documented in the Board's request "WTP-10-070 (Commodity Loads)." The response to that inquiry is contained in Bechtel National, Inc.'s CCN: 228219, dated December 6, 2010, which has been made available through the standard mechanisms.

All ongoing activities regarding the PRTs will continue to be communicated through the current process. Based on discussions by staff, we propose that PRT efforts, status, and issue resolution be provided directly to your staff as they occur rather than formally on a quarterly basis. This approach has been discussed with your staff and we agree this will provide more timely communication and will facilitate interaction in this area.



If you have any further questions, please contact me or Mr. Kenneth G. Picha, Jr., Acting Deputy Assistant Secretary for Safety and Security Program, at (202) 586-5151.

Sincerely,

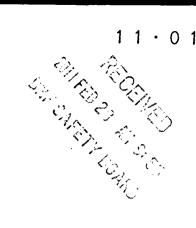
Inés R. Triay

Assistant Secretary for

Environmental Management

Enclosures

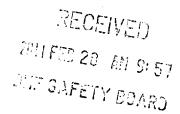
SEPARATION PAGE



Attachment - A 11-WTP-040

ORP Structural Peer Review Report of the November 1 and 2, 2010 Structural Peer **Review Meeting**

Pages 9(Including Coversheet)



ORP Structural Peer Review Report of the November 1 and 2, 2010 Structural Peer Review Meeting

December 15, 2010

Team Lead:

Frederick Loceff, ORP Consultant

Team Members:

LoringWyllie, Degenkolb Engineers

Greg Mertz, Los Alamos Nation Laboratory

Frederick Loceff, ORP Consultant Thomas Houston, ORP Consultant

ORP Structural Peer Review Report November 2010 Structural Peer Review Meeting

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Summary - The DOE Office of River Protection initiated an independent peer review of the structural PRT FETY BOAT design and analysis for the HLW and PTF facilities for the WTP project. The review took place at the Richland offices of BNI on November 1 and November 2, 2010. The review consisted of a sampling of structural design documents released since the April 2010 Structural PRT review; evaluation to identify if the soil-HLW structure interaction analyses using the SASSI software is prone the recent anomalies discovered by users of that code; and an in-depth discussion of the soil-structure interaction analyses of the PT Control Building. As a result seven comments requiring BNI response and two findings were made and are given in the Attachments A and B. In addition, during the review 22 open comments from previous reviews were closed.

1.0 PURPOSE, SCOPE AND APPROACH

1.1 PURPOSE

The purpose the Structural PRT reviews is to provide independent confirmation that the structural design as reflected in the procedures, criteria, guidance, analyses, calculations and drawings are in conformance with DOE Orders and Standards for the safety class assigned to the building structures.

1.2 SCOPE

The ORP Structural Peer Review Team (PRT) and ORP identified the following four objectives for the November review:

- 1. Review of the PTF Control Building soil-structure interaction analysis.
- 2. Identify if the soil-structure interaction analyses for HLW using the SASSI software is prone the recent anomalies discovered by users of that code.
- 3. Review a sampling of structural drawings and design calculations for the design of the HLW structural steel and the PTF structural steel.
- 4. Review the BNI responses to the PRT comments from previous reviews and where applicable close.

1.3 APPROACH

The approach consisted of reviewing structural calculations and drawings before and during the meetings on November 1 and 2. During the meetings presentations and discussions occurred on the topics identified in Section 2.2. The primary BNI participants in the discussion were Lisa Anderson, Thomas Ma, Kelsey Edwardsen and Farhang Ostadan for ongoing work. Review of the existing structural open items was coordinated with Chuck Mcconnel and Kelsey Edwardsen.

2.0 RESULTS

1. Review of the PTF Control Building soil-structure interaction analysis.

The PTF Control Building is a surface mounted SC-1 structure adjacent to the PTF building. Calculation 24590-PTF-S0C-S15T-00021 Revision A contains the SSI analysis of the PTF Control Building. The PRT reviewed this document before the peer review meeting and asked that knowledgeable engineers involved in the analysis be available at the meeting to respond to

our questions. Lisa Anderson, the author and Thomas Ma the reviewer were present at the meeting. The calculation considered the structure-soil-structure interaction between the PTF building and the PTF Control building as well and the PTF control building as an isolated structure. BNI satisfactorily answered the PRT questions; however, it was apparent that there needs to be better communication between the analysis engineers and the design engineers to assure that the attributes of the analysis models correctly reflect the building design conditions. One example is how the composite beams were intended to be modeled using pinned conditions so that all bending loads would be taken by the concrete slabs and not shared, except for axial load, with the steel beams.

2. Identify if the soil-structure interaction analyses for HLW using the SASSI software is prone the recent anomalies discovered by users of that code.

Dr. Farhang Ostadan presented results of SASSI modeling approaches on the HLW seismic responses. The adequacy of using the SASSI subtraction method for the soil structure interaction analyses for HLW was evaluated by comparing response spectra between the more rigorous direct (flexible volume) method of analyses and the subtraction method for the frequency range of interest. The response spectra show differences at higher frequencies (15 Hz to 22 Hz) where the subtraction method slightly underestimates the response. At elevations higher in the structure, the subtraction method diverges from the direct method at frequencies higher than about 8 Hz and tends to slightly overestimate the response between 8 Hz to 15 Hz. These differences indicate that the transfer functions for the two approaches diverge at frequencies above about 8 Hz, however, for the HLW; these differences do not appear to result in significant differences in computed seismic demand. It is noted that the input motion for HLW has very little energy at frequencies above about 10 Hz.

It is recommended that the results presented to the PRT be included in a formal document as part of the basis for accepting the SSI analysis approach used at HLW.

3. Review a sampling of structural drawings and design calculations for the design of the HLW structural steel and the PTF structural steel.

Several calculations and drawings were reviewed and comments are contained in the attachments according to the comment categories delineated in the next section. This resulted in two findings, both associated with meeting requirements in the AISC code.

4. Review the BNI responses to the PRT comments from previous reviews.

The PRT reviewed BNI responses to older PRT comments. Twenty-two open items from previous Structural PRT reviews have been closed and eighteen items remain open. One comment of concern to the PRT, re numbered as ORP -RPT-2009-A011 in the December 2009 PRT report, has been open for some time. This comment is:

Years ago, the PRT reviewed a load path study for the PTF. One of the concerns expressed dealt with the potential collectors or transfers from the floor diaphragms to the tops of the concrete walls. Now that the design of the Elevation 77 and 98 floor diaphragms is being completed, there is no evidence of any added reinforcing bars or non-typical steel beam/embed connections at the top of the shear walls. Please confirm that the load transfers to the tops of the shear walls have been properly addressed.

BNI responses to this comment, received after the November, 2010 meeting, have been reviewed, but have not been accepted by the PRT. Comment 7 below contains the latest response from the PRT on the BNI submittal to ORP -RPT-2009—A011.

3.0 CONCLUSIONS

- The review did not result in any major findings. The two findings listed in Attachment B are identified with not meeting requirements from the AISC standards.
- The PRT recommends that the presentation material showing the comparison between the SASSI direct method and the SASSI subtraction method be documented and issued as a formal calculation.
- The PRT recommends that communication between the analysis engineers in BNI
 Fredericksburg Office and the design engineers in Richland and Oakland offices be improved to
 assure that the attributes of the analysis models correctly reflect the building design conditions.

4.0 REFERENCES

- 24590-PTF-S0C-S15T-00021, PTF Control Building-SSI Analysis and Generation of Seismic Loads, Rev. A, 5/26/2009/
- 2. Ostadan Presentation on Effects of Subtraction vs. Direct for HLW.
- 24590-WTP-DGC-S13T-00142 "HLW Bar Cutting Limitations on Concrete Walls and Slabs, Rev A 7/12/2010
- 4. 24590-WTP-GPP-CON-3212 "Construction Procedure: Concrete Excavation, Rev. 0
- 5. 24590-HLW-SSC-S15T-00233 "Justification for not using 1.5 Multi Mode Factor for Selected Simply Supported Beams, Rev. 0
- 6. 24590-HLW-S0C-S15T-00042 "Glass Former Support and Access Platforms Between EL 58 & EL 103, Rev. A, 9/13/2010
- 7. 24590-PTF-DGC-S13T-00017, Design of PTF Walls EL 77' to 98' at Col Lines 1-8, B
- 8. 24590-PTF-DGC-S13T-00028, EL 77' Slab Design for PT Building Bounded by Column Lines 17.1 Thru 24.2
- 24590-PTF-DGC-S13T- 00029, EL 77' Slab Design for PT Building Bounded by Column Lines 24.2 Thru 31
- 10. 24590-PTF-SSC-S15T-00207, Structural Analysis and Steel Design of PTF Annex Building
- 11. 24590-PTF-SS-S15T-01017 Pretreatment Facility Annex Structural Steel Framing Connection Details

Attachment A - Follow- up Items

The seven comments in this appendix require response from BNI as indicated.

Docum HLW	Document No./Title: Ostadan Presentation on Effects of Subtraction vs Direct for Rev: A Document Date: 11/01/2010								
Review	Reviewer: ORP Structural Review Team: Greg Mertz, Tom Houston								
Item	Section	Page	Page Comment						
1.		7	A study comparing the response calculated using direct meth presented that showed differences between the results and owere acceptable for HLW design.						
			1) This study needs to be formalized as a WTP project calcula accepting the existing analysis.	1) This study needs to be formalized as a WTP project calculation to document a basis for accepting the existing analysis.					
			2) A comparison of direct and subtraction transfer functions to calculated response should be included in the calculation.	or each of th	ne nodes with				

Docun Limit:	Document Date: 7/10/2010				
Revie	wer: ORP	Structu	ral Review Team: Greg Mertz		
Item	Section	Page	Comment		
2.			24590-WTP-DGC-S13T-00142 uses a 0.9 D/C screen to ide not have bar cuts without prior engineering approval. 24 8.2.4.1 B and C allow up to 20% of the bars in a region to	590-WTP-3PS-1	
		This is an inconsistency between the two documents			
			Explain how a specification which allows up to 20% of the 0.9 D/C screen for engineering approval or modify the specific requirements.		

Docun Concr	Document Date: 6/6/2005						
Review	wer: ORP	Structui	ral Review Team: Greg Mertz:				
Item	Item Section Page Comment						
3.		28	24590-WTP-3PS-FA02-T0004 contains rules that allow cuttir approval but does not provide rules that require the consider given component.	_			
				TP-GPP-CON-3212 Section 3.4.9-c requires a review of the cut rebar field mode previously cut rebar, but looks to the engineering specifications (24590-WTP-304) for acceptance criteria.			
			The PRT recommends that 24590-WTP-3PS-FA02-T0004 b requirements to consider all previous rebar cuts in a given co		d to include explicit		

	Document No./Title: 24590-HLW-SSC-S15T-00233 "Justification for not using								
Revie	Reviewer: ORP Structural Review Team: Greg Mertz, Fred Loceff								
Item	Section	Page	Comment						
4.			24590-WTP-DC-ST-04-001 Rev 3 "Seismic Analysis and Design when the mass in a mode exceeds 75% of the total mass the mode dominant response and concluded that a multi-mode of HLW-SSC-S15T-00233 calculates the mass participation ratio and concludes, based on the SADC that a multi-mode factor of 1) What is the technical basis for the 75% mass limit in the SADC that a multi-mode factor of 1) what is the technical basis for the 75% mass limit in the SADC that a multi-mode factor of 1) what is the technical basis for the 75% mass limit in the SADC that a multi-mode factor of 1) what is the technical basis for the 75% mass limit in the SADC that a multi-mode factor of 1) what is the technical basis for the 75% mass participation assumes of behalf of 1). It is the conclusion in 24590-HLW-SSC-S15T-00233 that the response is 1.0 reasonable given the actual response of the two 4). The basis for 75% mass participation assumes a symmetric uniform stiffness and uniform loading. Any variation from the lower percentage of mass participating. Therefore, the use of problematic to the PRT.	response is factor of 1.0 of exactly 0. of 1.0 is applicable. The factor of 1.0 is applicable. The factor of 1.0 is a judgment of 1.0 i	considered as a single is appropriate. 24590-75 for a two span beam ropriate. ent based limit that factor for a two span a support at the center, lition will result in a				

	nent No./T Col Lines	Document Date: 2/01/2010								
Revie	Reviewer: ORP Structural Review Team Loring Wylie									
Item	Item Section Page Comment									
5.		9	Calculations should be logical and not just the manipulation of	numbers.						
			Appendix D resolves transverse shear D/C ratios greater than 1 line 4 above wall openings and below elevation 98. All have h 700+ kips tension. The LANL white paper, ECN 133337, is used shrinkage strain of 0.00060 (which was average shrinkage in the knowledge no shrinkage tests have ever been performed on W strain (70°F to 113°F) plus shrinkage strain of 0.0008365 in/in 1 from ECN 133337 (i.e., 1.5% less) so thermal can be ignored.	igh thermal I. Using a do ie 1965 SEA /TP concrete	loads in the range of efault ultimate OC report) while to our e, results in thermal					
			Then one looks at the calculations where cut 4:H.3 el 87-98 (N while cut 4:H.1 el 87-98 (S) at the other end of the spandrel or kips compression. Is this due to 43°F change in temperature?	•	· ·					
			Logic seems to be lacking. What is causing these high thermal	loads? Plea	se explain.					

	Document No./Title: 24590-PTF-DGC-S13T-00028 and 24590-PTF-DGC-S13T 00029, EL 77' Slab Design for PT Building								
Review	Reviewer: ORP Structural Review Team: Loring Wyllie								
Item	Item Section Page Comment								
6.	App. D		These two calculations have an Appendix D for Drag Strut Ana the area of drag strut steel required at wall ends and corners a reinforcement to determine the additional steel required for to conservative approach as some (perhaps half) of the typical regravity loads. However, the actual additional steel selected se concern moot. However, the heavier bars extend into the slat same location and extend apparently only a development length only in the same appropriate or effective way to detail seismic complete revise these bars, make them longer, stagger the cut offs bars are not counted twice.	and subtract he collector inforcement ems high en o 16 feet and th into the t llector reinfo	the area of typical . This is not a t is needed to resist ough to make this d all terminate at the wall. preement.				

Response		4590-PTF-SOC-S15T-00062, PTF Roof Steel Struct alysis	uic	Rev: A	Document Date: 9/28/2009
Reviewer:	RP Structi				
Item Se	on Page	Comment		Dispos	sition
7. Ge	ral	Years ago, the PRT reviewed a load path study for the PTF. One of the few concerns expressed dealt with the potential collectors or transfers from the floor diaphragms to the tops of the concrete walls. Now that the design of the Elevation 77 and 98 floor diaphragms is being completed, there is no evidence of any added reinforcing bars or non-typical steel beam/embed connections at the top of the shear walls. Please confirm that the load transfers to the tops of the shear walls have been properly addressed.	BNI respo HLW Reb The BNI s informative what did that Detail 1 continuous construction effective, I indicated in bars proper horizontal joint? I su short. At A demonstra 7'-3" are p horizontal offset laps (Note, if the this controlled the probles slab bars in hook at all are no controlled.	ar at Elevati ubmittal of I e but not co he calculatio only those I s and cross t on joint betw I count 7 ma he BNI re orly lapped w s to the east a-5 in the Si te that the 4 properly lapp #11 bars. T splice which his code req omment wil d as a Findir in the Slab s em is the typ nook at all w I wall interse	November 19 is mplete. At A-15, on require? Looking pars that are the "vertical veen El -5 and 0 are ximum, not 15 as esponse. Are these with the #11 wall of the construction splice which are took teches on page 4, #11 that extend only bed with the wall this appears to be an does not meet code uirement is not met, il need to be ag.) at Elevation 0 pical details where al alls and all wall barsections. Thus there is between slabs and

Attachment B - Findings

Finding – An individual item not meeting a committed requirement (e.g., contract, regulation, safety basis, QA program, authorization basis document or procedure.

	Document No./Title: - 24590-PTF-SSC-S15T-00207, Structural Analysis and Steel Rev: A Design of PTF Annex Building							
Revie	wer: ORP	Structur	al Review Team: Loring Wyllie					
Item	Section	Section Page Comment						
8.		228- 330	ORP -RPT-2010-F001 Calculation sheets 328-330 checks the horizontal bracing at the compression to flexure interaction uses negative compression 1.30 ratio for flexure. This is a misuse of this AISC/ANSI N69 slenderness ratio is very close to the x-axis values and it appearand a design revision is needed. It is noted that the calculation uses AISC LRFD 3 rd edition for neither AISC/ANSI N690-1994 nor AISC 9 th edition provides	(apparently to 20-1994 code are this WT something the same are the sam	tension) to offset at the formula. The y-axi the ection is overstressed to calculation since			

Docum ANNE	Document Date: 7/16/2010							
Reviev	Reviewer: ORP Structural Review Team: Loring Wyllie, Fred Loceff:							
Item	Section	Page	Comment					
9.	App. E		ORP -RPT-2010-F002 This drawing contains details the diagonal HSS brace to beam a. The 2 inch knife plate is welded to the 5/8 inch thick which exceeds code limits on fillet weld thickness as Specification for Structural Steel Buildings, Chapter maximum size fillet weld allowed is ¼ inch. b. What is the tolerance on the knife plate being off cer connection with side plates has adequate lateral stiff under some eccentricity that may occur within toleral	tubes with a specified in J; Section I ster line of the sess to prevent	a 34 inch fillet weld, a 1989 edition of AISC (2; Table J2.4. The the HSS? Verify that the			

SEPARATION PAGE



Attachment - B 11-WTP-040

ORP Equipment Peer Review Report of the November 1 and 2, 2010 Equipment Peer **Review Meeting**

Pages 6(Including Coversheet)

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LINE SAFETY BOARD

ORP Equipment Peer Review Report of the November 1 and 2, 2010 Equipment Peer Review Meeting

December 22, 2010

Team Lead:

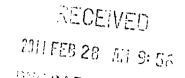
Frederick Loceff ORP Consumant

Team Members:

George Rawls, Savannah River Laboratory

Frederick Loceff, ORP Consultant

ORP Equipment Peer Review Report of the November 2010 Peer Review Meeting



Summary – The DOE Office of River Protection initiated an independent peer review of the equipment design and analysis for the HLW and PTF facilities for the WTP project. The review occurred at the Richland offices of BNI on November 1 and November 2, 2010. The review focused on the analysis and design of ASME pressure vessels, specifically on the Plant Wash Vessel (PWD-VSL-00044). Four EQPRT comments were made and are given in Attachments A. In addition, during the review 24 open comments from previous reviews were closed. Because of the importance of equipment and the maturing state of equipment procurement the EQPRT recommended that additional reviews of broader scope in increased frequency be initiated. It is noted that there have only been 2 EQPRT reviews prior to the current limited review.

1.0 PURPOSE, SCOPE AND APPROACH

1.1 Purpose

The purpose the EQPRT reviews is to provide independent confirmation that the structural qualification of SC-1 and SC-2 equipment reflected in the procedures, criteria, guidance, analyses, calculations, testing and drawings are in conformance with DOE Orders and Standards for the safety class assigned to the equipment.

1.2 Scope

The ORP Equipment Peer Review Team (EQPRT) and ORP identified the following four objectives for the November review:

- 1. Review of the generic procedure for qualification of pressure vessels.
- 2. Review, in depth, the stress analysis of the PTF Plant Wash Vessel.
- 3. Review the BNI responses to the EQPRT comments from previous reviews and where applicable close.

1.3 Approach

The approach consisted of reviewing calculations and drawings before and during the meetings on November 1 and 2. During the meetings in-depth discussions occurred on the topics identified in Section 2.2. The primary BNI participants in the discussions were John Julyk and Wade Wilcox. Review of the existing equipment open items was coordinated with Ken Simon and Tom Hughes.

2.0 RESULTS

1. Review of the generic procedure for qualification of pressure vessels.

This procedure is contained in Report 24590-WTP-GPG- M-0061, Rev 0. The EQPRT recommends that the criteria be revised to reference WRC Bulletin 432. The criteria should be revised to state the minimum fatigue strength reduction factor for each weld type that aligns with the current examination criteria. A lower fatigue strength reduction factor value than specified in WRC Bulletin 432 requires specific approval and specification of appropriate NDE techniques during fabrication.

2. Review, in depth, the stress analysis of the PTF Plant Wash Vessel.

This analysis is contained in Report 24590-PTF-MVC-PWD-00066, Rev A. The EQPRT review resulted in the three comments contained in Attachment A. Two of the comments are directed towards finite element modeling techniques and the third is asking that the design margins be included in the report.

3. Review the BNI responses to the EQPRT comments from previous reviews.

The PRT reviewed BNI responses to older PRT comments. Twenty-four open items from previous EQPRT reviews have been closed and fourteen items remain open

3.0 CONCLUSIONS

- The review resulted in four comments, none categorized as violations of code requirements or programmatic failures.
- The EQPRT recommends that additional reviews of broader scope of equipment and increased frequency be initiated. Three meetings over a four year period is not adequate to provide meaningful feedback to DOE and BNI on the credibility of equipment qualification.

4.0 REFERENCES

- 24590-WTP-GPG- M-0061, Vessel Structural Analysis and ASME Section VIII Evaluation, Revision 0, 4/08/2009
- 2. 24590-PTF-MVC-PWD-00066, Plant Wash Vessel Structural Analysis Stress Analysis with ANSYS, Revision A, 5/25/2010.
- 3. WRC Bulletin 432, Fatigue Strength Reduction and Stress Concentration Factors for Welds in Pressure Vessels and Piping, June 1998
- 4. WRC Bulletin 429, 3D Stress Criteria Guidelines for Application, February 1998

Attachment A - Follow- up Items

The four comments in this appendix require response from BNI as indicated.

	Document No./Title24590-WTP-GPG- M-0061, Vessel Structural Analysis and Rev: 0 ASME Section VIII Evaluation									
Revie	Reviewer: ORP Structural Review Team: George Rawls									
Item	Item Section Page Comment									
1.	9.9.1.2	88	This section of the fatigue evaluation criteria states that stres applied to calculate the peak stress. The criterion allows for the stress concentration factor and does not tie the stress cotype or the nondestructive evaluation method used to accept calculations indicated that in practice the Fatigue Strength Resulletin 432 are applied in the calculation of peak stress. The EQPRT recommends that the criteria be revised to refers should be revised to state the minimum FSRF for each weld the examination criteria. A lower fatigue strength reduction fact Bulletin 432 requires specific approval and specification of all fabrication. Note: this comment closes previous comments A-09-WED-AI WED-AMWTP-RPT-006-A031	wide latitude ncentration the weld. I eduction Facence WRC Buype that alightor value that appropriate N	e in the selection of factor to the weld Review of several tors from WRC Hetin 432. The criterians with the current pecified in WRC DE techniques during					

			590-PTF-MVC-PWD-00066, Plant Wash Vessel Structural with ANSYS	Rev. A	Document Date: 5/25/2010			
Reviewer: ORP Structural Review Team: George Rawls								
ltem	Section	Page	Comment					
2.	5.5	64	This section of the calculation indicates that the welds are mo components (i.e. nozzle to shell) interface. Discussion with en that the welds are not specifically modeled. For many shell/ in the stiffness of the weld provides a valid result. It is questioned the configurations in the Plant Wash Vessel. The EQPRT analysupport from the PJM connected to the vessel shell and found secondary stress at the toe on the cap weld. The EQPRT recommends that this modeling technique be valid nozzle/shell stiffness found in the WTP Vessels.	gineering po ozzle geom ible that this zed the case a 36% incre	ersonnel confirmed etries not modeling s is the case for all e of the 10 inch ease in primary plus			
3.	5.3	60	The Plant Wash Vessels was modeled using shell element, for in the vessel this appears appropriate. During the review at H several of the internal support where producing out of plane is shell elements. It is not clear from the data provided on the state this element will provide the correct response to these put the EQPRT recommends that additional justification of the sh support that they will give the correct response to the out of put of particular than they will give the correct response to the out of particular than they will give the correct response to the out of particular than they will give the correct response to the out of particular than they will give the correct response to the out of particular than they will give the correct response to the out of particular than the particular	anford it wa bunching sh hell elemen unching load ell elements	is determined that ear loads on these t in the calculation, ds.			

Docum Analy	Rev. A	Document Date: 5/25/2010					
Reviev	wer: ORP	Structur	al Review Team: George Rawls				
Item	Section	Page	Comment	Comment			
4.	8	536	The Results and Conclusion Section of the calculation provide margin on the vessel. The design margins provide important the structural integrity of the vessels and control for new load. The EQPRT recommends the Design margins be provided for should be given for all critical components for each load case.	data for futu ding during t calculation.	re management of he design process.		