

November 21, 2003

Dr. Mario V. Bonaca, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: PROPOSED RECOMMENDATIONS FOR GENERIC ISSUE (GI) - 186,
"POTENTIAL RISK AND CONSEQUENCES OF HEAVY LOAD DROPS IN
NUCLEAR POWER PLANTS"

Dear Dr. Bonaca:

Thank you for your September 24, 2003, letter and comments on our technical analysis of GI-186. The ACRS concurred with the staff's conclusion that regulatory action is warranted to reduce the number and potential severity of load drop events, and that while these events do not pose a high nuclear plant safety risk, they do raise significant concerns regarding worker safety. The ACRS also concurred with the recommendations developed by the staff to:

- (1) evaluate the capability of rigging components and materials to withstand rigging errors,
- (2) endorse the American Society of Mechanical Engineers (ASME) NOG-1, "Rules for Construction of Overhead and Gantry Cranes (Top Running Bridge, Multiple Girder)" for Type 1 cranes as an acceptable method of qualifying new or upgraded cranes as single-failure-proof,
- (3) reemphasize the need to follow NUREG-0612 "Control of Heavy Loads at Nuclear Power Plants" Phase 1 guidelines involving good practices for crane operations and load movements, and to continue to assess implementation of heavy load controls in safety-significant applications through the Reactor Oversight Process,
- (4) evaluate the need to establish standardized calculation methodologies for heavy load drops.

As the ACRS noted, the evaluation of operating experience indicates that operating events during heavy load movements do not pose a high nuclear plant safety risk. Therefore, new requirements on a generic basis could not be justified as a cost beneficial safety enhancement nor as actions necessary for adequate protection.

Nevertheless, enhancements to existing NRC guidance, as indicated by the recommendations, would address many of the issues identified by the survey of operating experience. The Office of Nuclear Reactor Regulation will respond to recommendations 1 through 3, while the Office of Nuclear Regulatory Research will respond to recommendation 4. After appropriate actions

Dr. Bonaca

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have been identified, we will keep the ACRS informed of enhancements to NRC guidance documents and decisions in response to the above recommendations.

Sincerely,

/RA W. F. Kane for/

William D. Travers
Executive Director
for Operations

cc: Chairman Diaz
Commissioner McGaffigan
Commissioner Merrifield
SECY

Dr. Bonaca

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