



Anthony R. Pietrangelo
VICE PRESIDENT
REGULATORY AFFAIRS

September 14, 2007

Mr. James E. Dyer
Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Initiative on Heavy Load Lifts

Project Number: 689

Dear Mr. Dyer:

Over the last several weeks, we have discussed with you and members of the NRC staff concerns regarding the interpretation and implementation of regulatory guidance associated with heavy load lifts. While there have been no significant events associated with heavy load lifts, we have identified a lack of consistency in plant licensing bases that pertain to this issue. Therefore, the industry has approved a formal initiative that specifies actions each plant will take to ensure that heavy load lifts continue to be conducted safely and that plant licensing bases accurately reflect plant practices. The initiative is enclosed for your information.

NEI will be forming a task force to assist industry implementation of the initiative. We intend to continue to communicate with the NRC staff in this effort to ensure that all concerns are appropriately addressed and that the initiative achieves its intended outcome.

Please contact me if you have any questions regarding the initiative.

Sincerely,

A handwritten signature in blue ink that reads "Anthony R. Pietrangelo".

Anthony R. Pietrangelo

Enclosure

INDUSTRY INITIATIVE ON HEAVY LOAD LIFTS

- A. For plants with an outage beginning before July 1, 2008:
- 1) For all heavy load lifts, ensure commitments to safe load paths, load handling procedures, training of crane operators, use of special lifting devices, use of slings, crane design, and inspection, testing, and maintenance of the crane are adequately implemented and reflected in plant procedures.
 - 2) For reactor vessel head lifts:
 - a) If you have a single failure proof crane or a load drop analysis (generic or plant-specific) that bounds your planned lifts with respect to load weight, load height, and medium present under the load, ensure your procedures for moving the head reflect your safety basis. Load drop analyses can be based on realistic (i.e. best estimate) calculations.
 - b) If you do not have a single failure proof crane or a load drop analysis (generic or plant-specific) that bounds your planned lifts with respect to load weight, load height, and medium present, the head lift should be conducted "wet" (i.e., the maximum head lift height while over the refueling cavity should be the minimum necessary to clear immovable structures around the refueling cavity and the bottom of the head should be less than 15 feet above the refueling cavity water surface except where additional height is necessary to clear immovable structures once the cavity is fully flooded).
 - 3) Ensure your maintenance rule (a)(4) administrative controls include the movement of heavy loads as a configuration management activity.
- B. For all plants with an outage beginning after July 1, 2008 and thereafter:
- 1) For all heavy load lifts, ensure commitments to safe load paths, load handling procedures, training of crane operators, use of special lifting devices, use of slings, crane design, and inspection, testing, and maintenance of the crane are adequately implemented and reflected in plant procedures.
 - 2) For reactor vessel head lifts and spent fuel cask lifts over the spent fuel pool, ensure you have a single failure proof crane or a load drop analysis (generic or plant-specific) that bounds your planned lifts with respect to load weight, load height, and medium present under the load, and ensure your procedures for moving these loads reflect your safety basis. Load drop analyses can be based on realistic (i.e. best estimate) calculations
 - 3) Ensure your maintenance rule (a)(4) administrative controls include the movement of heavy loads as a configuration management activity.
 - 4) In your next FSAR update, provide a summary description of your basis for conducting safe heavy load movements, including commitments to safe load paths, load handling procedures, training of crane operators, use of special lifting devices, use of slings, crane design, and inspection, testing, and maintenance of the crane. If the safety basis includes reliance on a load drop analysis, then that fact should be included in the summary description within the FSAR.
 - 5) If load drop analyses are used, ensure restrictions on load height, load weight, and medium present under the load are reflected in plant procedures.