



NUCLEAR ENERGY INSTITUTE

Thomas C. Houghton

DIRECTOR

STRATEGIC REGULATORY PROGRAMS

April 17, 2008

Mr. William H. Ruland
Director, Division of Safety Systems
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Initiative on Control of Heavy Loads

Project Number: 689

Dear Mr. Ruland:

The nuclear industry is moving forward with its initiative on control of heavy loads that was approved last September. To that end, enclosed for NRC endorsement is the draft guidance "Industry Criteria for Reactor Vessel Head Load Drop and Consequence Analysis." The development of this guidance has benefited from several interactions with the NRC staff since last December. This guidance is an essential part of the industry initiative. We respectfully request a letter from the agency indicating that the guidance provides realistic criteria acceptable to the NRC for performing load drop analyses.

The industry is also in the final stages of developing guidance on "Reactor Head Lift Single Failure Proof Crane Equivalence." We met with NRC staff today and expect to forward this guidance for NRC endorsement next week. We also request a letter indicating that the guidance is acceptable to the NRC for single failure proof crane equivalence for reactor vessel head lifts.

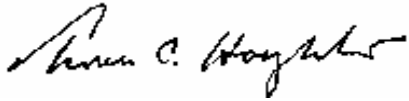
Ultimately, we will combine the two guidance documents above along with guidance on updating the plant Final Safety Analysis Report to reflect the current licensing basis with respect to control of heavy loads into a single industry guideline. Our intent is to seek NRC endorsement through a Regulatory Issue Summary for the guideline.

Given the timing of the development of the guidance on load drop analysis and single failure proof crane equivalence, we expect that some plants with outages later this year may be unable to complete the portion of the initiative that relied on this guidance. In these cases, we would expect that "wet" lifts may be the option of choice, and that this would be consistent with the intent of the initiative to assure safe lifts. We also believe that this approach would be consistent with the intent of Enforcement Guidance Memorandum 07-06.

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We look forward to finalizing the industry guidance and completion of the industry initiative on control of heavy loads. We appreciate the efforts of the NRC staff in supporting this initiative. Please contact me if you have any questions at (202) 739-8107 or tch@nei.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas C. Houghton". The signature is written in a cursive style with a prominent initial 'T' and a long horizontal stroke at the end.

Thomas C. Houghton

Attachment