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FROM: Carolina Power and Light Company, Raleigh, N.C. 27602 E.E. Utley			DATE OF DOC 4-15-75	DATE REC'D 4-16-75	LTR XX	TWX	RPT	OTHER
TO: Mr. Karl R. Goller			ORIG 3 signed	CC 40	OTHER	SENT AEC PDR <u>XX</u> SENT LOCAL PDR <u>XX</u>		
CLASS	UNCLASS XX	PROP INFO	INPUT	NO CYS REC'D 40		DOCKET NO: 50- 261		
DESCRIPTION: Letter re. our 9-25-75 letter trans the following:  <div style="text-align: center; font-size: 1.2em; opacity: 0.5;">ACKNOWLEDGED</div> <div style="text-align: center; font-size: 1.2em; opacity: 0.5;">DO NOT REMOVE</div> PLANT NAME: H.B, Robinson Unit No. 2				ENCLOSURES: Provides info. relative to the use of a GE-IF-300 spent fuel shipping cask utilizing a single lifting yoke				

**FOR ACTION/INFORMATION WTM 4-17-75**

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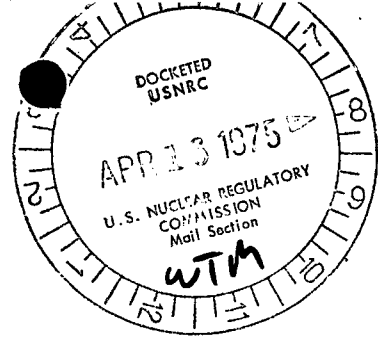
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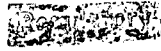


Carolina Power & Light Company

April 15, 1975



FILE: NG-3514 (R)



SERIAL: NG-75-534

50-261

Mr. Karl R. Goller  
Assistant Director for Operating Reactors  
Office of Nuclear Reactor Regulations  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Goller:

H. B. ROBINSON UNIT NO. 2  
LICENSE DPR-23  
SPENT FUEL SHIPPING CRANE



Reference (1) provided information on the replacement spent fuel cask handling crane as requested by your letter of September 25, 1974. Reference (2) provided information relative to the use of a GE-IF-300 spent fuel shipping cask utilizing a single lifting yoke. Subsequent to forwarding Reference (2), the Auxiliary and Power Conversion Systems Branch of the NRC requested a meeting with CP&L to discuss the information presented in References (1) and (2). The first meeting was held on January 16, 1975 as summarized in Reference (3). A follow-up meeting was held on January 27, 1975 as summarized in Reference (4). As indicated in Reference (3), a draft Regulatory Guide on Overhead Crane Handling Systems for Nuclear Power Plants was presented in the first meeting. In the follow-up meeting on January 27, 1975, the criteria of the draft Regulatory Guide were compared to the actual crane design criteria. Since the draft Regulatory Guide was available approximately 15 months after the crane was ordered, several of the criteria cannot feasibly be incorporated into the design. The crane delivery was completed on March 7, 1975 and all major components have now been installed. Our present target date for shipping spent fuel utilizing the new crane for cask handling operations at the plant is May 1, 1975. During the meetings summarized in References (3) and (4), it was determined by CP&L that crane design criteria fall into one of the four following categories in comparison to the draft Regulatory Guide criteria:

- (1) Criteria in the draft Regulatory Guide is not applicable to this crane.
- (2) Crane is not designed to meet draft Regulatory Guide criteria.
- (3) Criteria presented by draft Regulatory Guide are difficult to interpret. Also, explanations of the criteria presented by the NRC in the January 16 and January 27 meetings were difficult to interpret or relate to the written criteria.

April 15, 1975

(4) Crane meets criteria of the draft Regulatory Guide.

CP&L agreed in the January 27 meeting to provide a position on each of the criteria contained in the draft Regulatory Guide. Each position on the draft Regulatory Guide criteria, as CP&L understands and interprets them, is provided in Attachment 1. Based on a review of the draft Regulatory Guide, it has been determined that no changes in the crane design are required.

In accordance with 10 CFR Parts 50.59(a) and 50.59(c) and the H. B. Robinson Technical Specifications, the replacement cask handling crane has been reviewed by the Plant and Company Nuclear Safety Committees of CP&L. The crane has been determined not to involve a change in Technical Specifications or an unreviewed safety question. Therefore, Commission authorization is not required for the use of the crane for spent fuel cask handling operations (scheduled to begin on May 1, 1975) as provided by the provisions of the H. B. Robinson operating license.

Yours very truly,



E. E. Utley

Vice President

Bulk Power Supply

JMB:jwk

Attachment

References:

1. CP&L letter Serial NG-74-1246 dated October 17, 1974, E. E. Utley CP&L to Mr. Karl R. Goller AEC.
2. CP&L letter Serial NG-74-1445 dated December 26, 1974, E. E. Utley CP&L to Mr. Edson G. Case AEC.
3. NRC summary of meeting held on January 16, 1975 to discuss spent fuel handling system for Robinson-2 Docket No. 50-261.
4. NRC summary of meeting held on January 27, 1975 to discuss the Robinson-2 Crane System.

cc: Mr. N. B. Bessac  
Mr. P. W. Howe  
Mr. R. E. Jones  
Mr. J. B. McGirt  
Mr. D. B. Waters

ATTACHMENT 1

CP&L positions on criteria contained in Draft Branch Position, Overhead Crane Handling Systems for Nuclear Power Plants dated January 10, 1975.

1. Performance Specification and Design Criteria

- a. Separate performance specifications which are required to develop design criteria should be prepared for a permanent crane which is to be used for construction prior to use for plant operation. The allowable design stress limits should be identical for both cases, and the sum total of simultaneously applied loads should not result in stress levels causing permanent deformation other than localized strain concentration in any part of the handling system. If allowable design stress limits are to be exceeded during the construction phase, added inspection supplementing that of C.2(t) should be considered.

CP&L: This paragraph does not apply to the replacement cask handling crane since H. B. Robinson, Unit #2 is an operating plant.