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 AUTH.NAME: AUTHOR AFFILIATION
 VAN BRUNT,E.E. Arizona Public Service Co.
 RECIP.NAME: RECIPIENT AFFILIATION
 KNIGHTON,G.W. Licensing Branch 3

SUBJECT: Changes commitment re NUREG-0612, "Control of Heavy Load,"
 w/respect to painted lines on top of secondary shield walls.
 Exclusion zone will be designated as area within secondary
 shield walls. Walls provide identifiable limit of travel.

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NOTES: Standardized plant. 05000528
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The following information was obtained from the records of the
 Department of the Interior, Bureau of Land Management, at
 Washington, D. C., on the 10th day of May, 1906.
 The land described in the foregoing is situated in the
 County of ... State of ...

"Very truly yours,"
 William ...
 Special Agent in Charge

This is to certify that the above is a true and correct
 copy of the original as the same appears in the files of the
 Department of the Interior, Bureau of Land Management, at
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Arizona Nuclear Power Project

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Director of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

July 5, 1985
ANPP-32958-EEVB/JKO

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN-50-528(License No. NPF-41)/529/530
File: 85-056-026; G.1.01.10

Reference: Letter from E. E. Van Brunt, Jr., APS, to T. H. Novak, NRC, dated November 10, 1982 (ANPP-22328). Subject: Responses to recommendations of NUREG-0612.

Dear Mr. Knighton:

As you are aware, NUREG-0612, "Control of Heavy Loads," states in article 5.1.1(1) that safe load paths should be ". . . clearly marked on the floor in the area where the load is to be handled." In the referenced letter, APS made the following response to satisfy this recommendation:

"Safe load paths will be marked on floor plan drawings and include these paths in approved procedures. In addition an "exclusion zone" around the reactor vessel will be painted on the top of the secondary shield walls.

APS does not plan to mark safe load paths on floors for the following reasons:

- (A) Coverings utilized for the control of contamination, which are placed on floors will render them useless.
- (B) Areas exist, specifically in containment, over which many safe load paths for various pieces of equipment exist. These markings would serve only to confuse both crane operators and directors.

APS will commit to having an individual responsible for walking down the safe load path prior to the lift. This individual will also have a copy of the safe load path along with the procedure for that particular lift, to ensure that the crane operator follows it correctly."

The purpose of this letter is to change the APS commitment with respect to painted lines on top of the secondary shield walls. The "exclusion zone" will be designated as the area within the secondary shield walls. These walls provide a readily identifiable limit of travel to assure no encroachments into the "exclusion zone." It is not necessary to have a line or marking on top of the secondary shield walls since the walls are in the field of view of the crane operator and they are easy to identify. This is the only portion of the response being changed. Walking down the safe load path prior to the lift will still be required.

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G. W. Knighton

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If you have any futher questions on this matter, please contact Mr. W. F. Quinn.

Very truly yours,



E. E. Van Brunt, Jr.
Executive Vice Presient
Project Director

EEVB/JKO/slh

cc: E. A. Licitra
R. P. Zimmerman
A. C. Gehr

