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July 17, 1981
JPN-81-52

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Washington, D.C. 20555

Attention: Mr. Thomas A. Ippolito, Chief
Operating Reactors Branch No. 2
Division of Licensing

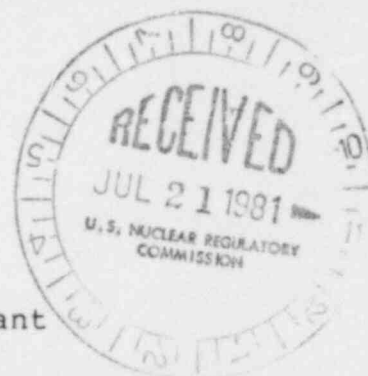
Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Control of Heavy Loads

References: 1) Letter D.G. Eisenhut (NRC) to all Operating
Reactors dated December 22, 1980
2) Letter J.P. Bayne (PASNY) to T.A. Ippolito (NRC)
dated May 18, 1981 (JPN-81-37)

Dear Sir:

Reference 1 requires operating plants to implement interim actions to control the movement of heavy loads over safe shutdown equipment and spent fuel, until the plant complies with the criteria of NUREG-0612. In Reference 2, the Power Authority responded to these requirements by requesting an extension of the implementation date to allow more time to complete the review of existing safe load paths, procedures, equipment and personnel qualifications for safe load handling. This letter also stated that until the interim actions are implemented, the Authority would perform a safety analysis and prepare a written safety evaluation in accordance with 10CFR50.59 prior to the movement of a heavy load over safety-related equipment.

To date, the Authority has met this commitment for applicable loads. However, a series of heavy load lifts has been identified which must be made to prepare for the October 1, 1981 refueling outage and for which a safety analysis would be very complex and time-consuming to perform. The lifts involve the movement of LPRM liners and casks, new fuel shipments, new high density spent fuel racks and other equipment between elevations 272'-0" and 369'-6" in the Reactor Building.



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For one or more of these lifts, completion of a safety analysis could conceivably impact the outage schedule. Therefore, the Authority intends to review future lifts of heavy loads over safe shutdown equipment on a case-by-case basis and, for each lift, either: a. perform a load drop analysis and prepare a written safety evaluation in accordance with 10CFR50.59; or, b. implement the interim actions specified in Enclosure 2 of Reference 1. For lifts where the interim actions are implemented, written documentation demonstrating compliance with Enclosure 2 of Reference 1 will be maintained at the JAFNPP. The Authority will continue making case-by-case reviews of heavy load lifts over safe shutdown equipment, and satisfying one of the options stated above, until plant-wide implementation of the interim actions is completed. This approach has been found acceptable in discussions with your staff.

In the application for an amendment to the JAFNPP operating license, regarding expansion of the spent fuel pool storage capacity, the Authority stated that no loads would be moved over spent fuel during reracking operations. Subsequent to the Authority's application, NUREG-0612 defined "heavy load" in such a way as to classify portions of the crane, for example the main load block, as heavy loads. It was not the Authority's intent to preclude moving any portion of the crane over spent fuel since the crane is required for refueling and reracking operations. In addition, adequate physical and administrative controls govern operation of the crane over the spent fuel pool. Therefore, it is the Authority's understanding that movement of any portion of the crane over spent fuel is acceptable. This understanding has also been found acceptable in discussions with your staff.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

C.M. Wilberding

for J.P. Bayne
Senior Vice President
Nuclear Generation