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September 22, 1981



OCAN098107

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Arkansas Nuclear One - Units 1 and 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPR-6
NUREG-0612 "Control of Heavy Loads at
Nuclear Power Plants"
(Generic Letter 81-07)
(File: 1510, 2-1510)

Gentlemen:

The purpose of this letter is to provide you with the attached submittal on NUREG-0612 per the revised response schedule requested in our June 22, 1981 letter. Specifically, this submittal addresses the commitments and information solicited in Items 2 and 3 on Page 2 of your December 22, 1980 letter. Should you have any questions before our next scheduled response date of December 22, 1981, please advise accordingly as we are actively proceeding to address the intent of NUREG-0612. AP&L has spent over \$220,000 to date in addressing NUREG-0612.

Sincerely,

David C. Trimble

David C. Trimble,
Manager, Licensing

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Attachment

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MEMBER MIDDLE SOUTH UTILITIES SYSTEM

ATTACHMENT TO AP&L'S SEPTEMBER 22, 1981 LETTER

Purpose: It is the purpose of this attachment to provide information relative to Items 2 and 3 as requested on Page 2 of NRC's December 22, 1980 letter.

Information Requested

AP&L committed in our letter dated June 22, 1981 to provide NRC by September 22, 1981:

- 1) Confirmation that implementation of those changes and modifications that we find are necessary will commence as soon as possible without waiting on staff review, so that all such changes, beyond the interim actions, will be completed within two years of submittal of the Section 2.4 information; and
- 2) Justification for any changes or modifications that would be required to fully satisfy the guidelines of NUREG-0612 which we believe are not necessary.

Background Information

With reference to AP&L's letter dated May 15, 1981, we confirmed to NRC that AP&L had completed its work on the "Interim Actions for the Control of Heavy Loads" at Arkansas Nuclear One, Units One and Two. We also indicated that a report would be sent to NRC by June 1, 1981, that would summarize our actions relative to the information requested by Enclosure 2 of your December 22, 1980 letter. That report, sent to NRC in our letter dated May 29, 1981, also addressed specific work on the General Requirements for Overhead Handling Systems as referenced in Section 2.1 of Enclosure 3 of NRC's December 22, 1980 letter on Page 2 of Item 1. We indicated to NRC at that time that additional information would be forthcoming in order to meet the requested response date of June 22, 1981, which we met.

Our June 22, 1981 letter had four purposes. The first purpose was to reconfirm to NRC that AP&L had completed its work on the "Interim Actions for Control of Heavy Loads" at ANO-1 and 2. Specifically, we gave a detailed description of the items considered in our complying with the requested interim actions of Enclosure 2 of NRC's December 22, 1980 letter. We concluded that we had adequately considered and positively addressed all significant aspects of the requested interim actions and were in full and complete compliance in every respect. All documentation is readily available at the plant site for NRC's inspection.

The second purpose of our June 22, 1981 letter was to complete our response to Section 2.1 of Enclosure 3, "Request for Additional Information on Control of Heavy Loads" at ANO-1 and 2. The purpose of these analyses was to verify that our various crane designs complied with the applicable CMAA and ANSI guidelines. Additionally, we gave a detailed description of those specific items which were considered in complying with the requested "General Requirements for Overhead Handling Systems" information contained in our June 22, 1981 and May 29, 1981

correspondence. With the submittal of these attachments, we concluded that we had adequately considered and positively addressed all significant aspects of the requested Section 2.1 information and that we were in general compliance with all Section 2.1 reporting requirements. The third purpose of our June 22, 1980 letter was to request a three-month extension to the remaining requested response dates in NRC's December 22, 1980 letter, and the fourth purpose was to provide NRC with an overview of our NUREG-0612 status to date.

Item 2 Response

As NRC requested us to do, A&L hereby formally commits to the implementation of those changes and modifications that we determine to be necessary. We also agree that our implementation of these changes and modifications will commence as soon as possible without waiting on NRC staff review, so that all such changes which we determine to be necessary to meet our interpretation of the intent of NUREG-0612, including and beyond the interim actions, will be targeted for completion within two years of the submittal date of the Section 2.4 information, which has been revised to December 22, 1981.

Item 3 Response

NRC also requested us to furnish justification for any changes or modifications that would be required to fully satisfy the guidelines of NUREG-0612 which we believe are not necessary.

First of all, we take exception to the NUREG's arbitrary application of ANSI 14.6-1978 to all "Heavy Loads" because ANSI 14.6-1978 specifically states that it covers the design, fabrication, etc. for special lifting devices for containers weighing 10,000 pounds or more for nuclear materials, and for those features of the attachment members of the container that affect the function and safety of the lift. By strict and unyielding interpretation of NUREG-0612 to the written letter, we would be forced to conclude that we do have lifting devices that do not meet ANSI 14.6-1978 as it is rigidly applied by NUREG-0612 in Section 5.1.1(4).

Secondly, although our engineering analyses are not totally complete, preliminary indications are that no hardware changes or modifications will be required at ANO-1 or 2 in order to meet the intent of NUREG-0612; therefore, none are presently planned. Additionally, since the crane hardware at both ANO-1 and 2 were specified, purchased and installed to the state-of-the-art when the units were designed and constructed, we strongly feel that NUREG-0612 would best be addressed at ANO-1 and 2 by our concerted efforts on emphasizing increased crane operator awareness through expanded training programs, procedures development, identification of safe load paths, improved maintenance programs, etc. Contributing to the preliminary indication of crane hardware changes not being necessary at ANO-1 or 2 is the fact that NUREG-0612 was not distributed for formal public comment prior to its being published as a NUREG. But in any event, we are convinced that for ANO-1 and 2, the intent of NUREG-0612 would be best served by strengthening our administrative controls oriented to increasing crane operator awareness

and developing appropriate procedural refinements. We are actively proceeding in this manner to address our interpretation of the intent of NUREG-0612.