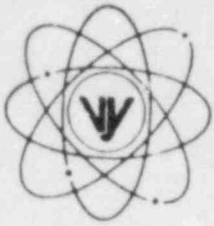


VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Brattleboro, VT 05301

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REPLY TO:
ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
TELEPHONE 617-872-8100

November 30, 1983

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing

References: (a) License No. DPR-28 (Docket No. 50-271)
(b) Letter, USNRC to VYNPC, dated May 26, 1983
(c) Letter, VYNPC to USNRC, dated September 11, 1981

Dear Sir:

Subject: Control of Heavy Loads - Phase I

Reference (b) required that we provide additional information regarding open items identified in the Franklin Research Center (FRC) Final Draft Evaluation Report included therewith. Information is submitted as follows in response to your request.

1. Recommendation/Open Item

Vermont Yankee Nuclear Power Corporation should provide appropriate information to support exclusion of the following load handling systems from compliance with NUREG 0612:

Reactor Feedwater Pump Monorails
Diesel Generator Monorails
HPCI Equipment Monorails
Recirculation Motor Generator Sets Monorail

Response:

A. Reactor Feedwater Pump Monorails, Recirculation Motor Generator Set Monorail

As stated in Reference (c) and again in the TER-referenced March 15, 1982 conference call, there is no safety related equipment or equipment needed for safe shutdown in the vicinity of the Reactor Feedwater Pump Monorails or the Recirculation Motor Generator Sets Monorail. This clearly excludes the Reactor Feedwater Pump Monorails and the Recirculation Motor-Generator Sets Monorail from any consideration within the scope of the NUREG 0612.

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B. Diesel Generator Monorails; HPCI Equipment Monorails; RCIC Equipment Monorail

These monorails are special-purpose handling devices which are primarily used for load handling associated with a single safety system. These devices are normally used during performance of maintenance when the affected safety system is out of service. To ensure that these monorails will not be used in a manner which could jeopardize the availability of the affected safety equipment, administrative controls will be established which require locking of the monorails and placement of signs directing users to obtain the permission of appropriate supervision prior to use. A procedure for control of special purpose monorails will be prepared and issued by June 1, 1984.

2. Recommendation/Open Items

To ensure that loads are safely handled at Vermont Yankee Nuclear Power Station, the Licensee should perform the following actions:

- a. Perform an engineering review of load paths currently in use, and formally approve and incorporate into procedures and drawings those load paths for major loads lifted at the Vermont Yankee plant.
- b. Provide suitable visual aids for the crane operator to ensure adherence to established load paths.
- c. Verify that deviations from these load paths require approval by the Plant Safety Review Committee or its equivalent.

Response

Vermont Yankee's position remains firm that our present plant policy for handling of heavy loads with the Reactor Building Crane is sufficient. Loads are lifted and moved directly to their intended destinations carefully and expeditiously in order to minimize handling time. Pick heights are kept within reasonable limits. Vermont Yankee personnel involved in such load handling have been trained in the importance of safe load handling in the reactor cavity and spent fuel areas and are fully aware of the risks associated with the handling of heavy loads in these critical areas. Operational procedures written to administratively control maintenance efforts related to the above have sufficient precautions which emphasize proper load handling. Personnel assigned to direct the progress of each move ensure that moves are carried out safely in accordance with the constraints previously mentioned. The use of floor markings or other visual aids would be cumbersome, and could encourage those personnel to relinquish responsibility for directing the move, which would detract from safety.

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We believe that the constraints described in this response and in our previous written and verbal correspondence provide adequate assurance that the intent of NUREG 0612 will be met.

3. Recommendations/Open Item

The Vermont Yankee plant should perform a load test of special lifting devices subject to compliance with NUREG 0612.

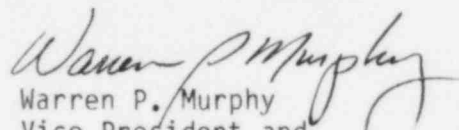
Response

Vermont Yankee has identified certain lifting devices that fall under the consideration of NUREG 0612. Those lifting devices were fabricated prior to the existence of ANSI 14.6, at which time an initial load test was not required. Since we were unable to procure stress analysis information for those special lifting devices, stress analyses were recently performed. The results of these analyses were submitted to you on April 1, 1982 and FRC accepted the data as sufficient to demonstrate the design adequacy of the special lifting devices identified. In Reference (c) it was stated that a one-time inspection of the special lifting devices would be completed prior to the 1983 refueling outage to meet the intent of the NUREG. That inspection was completed with the exception of the RPV head lifting ears, which were inspected during the outage. Non-destructive examination techniques such as ultrasonic, magnetic particle, liquid penetrant and visual were used where appropriate. The detailed inspection did show signs of some inferior craftsmanship on the special lifting devices, but the defects were determined to be cosmetic in nature. There were no signs of structural weakness caused by either poor workmanship or fatigue. Based on the results of this one-time inspection, Vermont Yankee feels that a ten-year reinspection period is justifiable and consistent with the ISI program for pressure boundary systems.

We trust that the information presented herein will clarify Vermont Yankee's position regarding these open items. If you should have any further questions, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Warren P. Murphy
Vice President and
Manager of Operations