

CHARLES H. CRUSE  
Vice President  
Nuclear Energy

Baltimore Gas and Electric Company  
Calvert Cliffs Nuclear Power Plant  
1650 Calvert Cliffs Parkway  
Lusby, Maryland 20657  
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May 13, 1996

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
30-Day Response to NRC Bulletin 96-02: Movement of Heavy Loads Over  
Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment

REFERENCE: (a) NRC Bulletin 96-02: Movement of Heavy Loads Over Spent Fuel, Over  
Fuel in the Reactor Core, or Over Safety-Related Equipment, dated  
April 11, 1996

This letter provides our 30-day response to NRC Bulletin 96-02: Movement of Heavy Loads Over Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment. The bulletin requests that we review our plans and capabilities for handling heavy loads while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled). The review allows us to determine if our heavy load handling procedures are in accordance with existing regulatory guidelines and determine whether heavy load handling activities conducted at Calvert Cliffs Nuclear Power Plant are within our licensing basis.

Attachment (1) provides the report that addresses our review of our plans and capabilities.

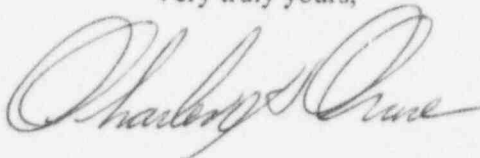
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Should you have questions regarding this matter, we will be pleased to discuss them with you.


Very truly yours,



STATE OF MARYLAND :  
: TO WIT:  
COUNTY OF CALVERT :

I hereby certify that on the 13th day of May, 1996, before me, the subscriber, a Notary Public of the State of Maryland in and for Calvert County, personally appeared Charles H. Cruse, being duly sworn, and states that he is Vice President of the Baltimore Gas and Electric Company, a corporation of the State of Maryland; that he provides the foregoing response for the purposes therein set forth; that the statements made are true and correct to the best of his knowledge, information, and belief; and that he was authorized to provide the response on behalf of said Corporation.

WITNESS my Hand and Notarial Seal:

  
Notary Public

My Commission Expires:

2/2/98  
Date

CHC/TWG/dlm

Attachment: (1) BGE's Response to NRC Bulletin 96-02: Movement of Heavy Loads Over Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
Director, Project Directorate I-1, NRC  
A. W. Dromerick, NRC

T. T. Martin, NRC  
Resident Inspector, NRC  
R. I. McLean, DNR  
J. H. Walter, PSC

**ATTACHMENT (1)**

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**RESPONSE TO NRC BULLETIN 96-02:  
MOVEMENT OF HEAVY LOADS OVER SPENT FUEL, OVER FUEL IN THE  
REACTOR CORE, OR OVER SAFETY-RELATED EQUIPMENT**

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## ATTACHMENT (1)

### RESPONSE TO NRC BULLETIN 96-02 MOVEMENT OF HEAVY LOADS OVER SPENT FUEL, OVER FUEL IN THE REACTOR CORE, OR OVER SAFETY-RELATED EQUIPMENT

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#### **I. Required Response**

- (1) *For licensees planning to implement activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment within the next two years from the date of this bulletin, provide the following:*
- *A report, within 30 days of the date of this bulletin, that addresses the licensee's review of its plans and capabilities to handle heavy loads while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled) in accordance with existing regulatory guidelines. The report should also indicate whether the activities are within the licensing basis and should include, if necessary, a schedule for submission of a license amendment request. Additionally, the report should indicate whether changes to Technical Specifications will be required.*

#### **Baltimore Gas and Electric Company Response**

Baltimore Gas and Electric Company does plan activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment within the next two years. Some of these activities involve handling heavy loads over spent fuel or safety-related equipment while the reactor is at power. Baltimore Gas and Electric Company has no plans to conduct activities involving the handling of heavy loads over fuel in the reactor core while the reactor is at power.

An administrative procedure (MN-1-104, "Load Handling") establishes the requirements and assigns responsibilities for activities involving load handling at Calvert Cliffs Nuclear Power Plant. Among the many administrative controls placed on heavy load handling, MN-1-104 requires that detailed handling instructions be incorporated into procedures and work instructions whenever heavy loads are lifted using cranes requiring path restrictions. Handling instructions have been incorporated into a total of 76 technical procedures, and all 76 of these technical procedures have been reviewed and meet the current requirements described in MN-1-104. Procedure controls require that these procedures be reviewed against the licensing basis during initial approval and each time they are changed. However, all load handling procedures are again being reviewed to ensure that their governed activities are within the Calvert Cliffs licensing basis. Existing work instructions that govern activities involving heavy load handling will also be reviewed against the licensing basis. Any improvements to our load handling procedures and instructions will be made, as necessary, to ensure that load handling activities are within the Calvert Cliffs licensing basis. However, we do not anticipate the need for a license amendment to support these activities. All reviews described in the response above will be completed by November 11, 1996.

## ATTACHMENT (1)

### **RESPONSE TO NRC BULLETIN 96-02 MOVEMENT OF HEAVY LOADS OVER SPENT FUEL, OVER FUEL IN THE REACTOR CORE, OR OVER SAFETY-RELATED EQUIPMENT**

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#### **Required Response**

- (2) *For licensees planning to perform activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled) and that involve a potential load drop accident that has not previously been evaluated in the FSAR, submit a license amendment request in advance (six-nine months) of the planned movement of the loads so as to afford the staff sufficient time to perform an appropriate review.*

#### **BGE Response**

Baltimore Gas and Electric Company maintains an administrative procedure that ensures changes, tests and experiments are evaluated in accordance with 10 CFR 50.59. In 1991, this procedure ensured that the planned activity involving the handling of the 100 ton transfer cask for transfer of spent fuel was evaluated against the Calvert Cliffs licensing basis. As a result, Baltimore Gas and Electric Company submitted a license amendment request (Reference 1). To effect the proposed changes, we upgraded the spent fuel cask handling crane to "single-failure-proof" status as defined by NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants." The NRC approved these license amendments in Reference (2).

Subject to our ongoing review, Baltimore Gas and Electric Company has no plans to perform activities involving the handling of heavy loads that involve a potential load drop accident that has not previously been evaluated in the FSAR. If we determine that a planned load handling activity involves a potential load drop accident that has not previously been evaluated in the FSAR, we will submit a license amendment request as far as possible in advance of the planned movement of the load. However, Baltimore Gas and Electric Company does not anticipate the need for a license amendment at this time.

#### **Required Response**

- (3) *For licensees planning to move dry storage casks over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled), include in Item 2 above, a statement of the capability of performing the actions necessary for safe shutdown in the presence of radiological source term that may result from a breach of the dry storage cask, damage to the fuel, and damage to safety-related equipment as a result of a load drop inside the facility.*

## ATTACHMENT (1)

### **RESPONSE TO NRC BULLETIN 96-02 MOVEMENT OF HEAVY LOADS OVER SPENT FUEL, OVER FUEL IN THE REACTOR CORE, OR OVER SAFETY-RELATED EQUIPMENT**

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#### BGE Response

Item (3) is not applicable to BGE. See response to Item (2) above.

#### Required Response

- (4) *For licensees planning to perform activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled), determine whether changes to Technical Specifications will be required in order to allow the handling of heavy loads (e.g., the dry storage canister shield plug) over fuel assemblies in the SFP and submit the appropriate information in advance (six-nine months) of the planned movement of the loads for NRC review and approval.*

#### BGE Response

At this time, changes to the Calvert Cliffs Technical Specifications are not required in order to allow the handling of heavy loads (e.g., the dry storage canister shield plug) over fuel assemblies in the spent fuel pool. See response to Item (2) above.

- REFERENCES:
- (1) Letter from Mr. G. C. Creel (BGE) to NRC Document Control Desk, dated July 2, 1991, Single-Failure-Proof Upgrade and Technical Specification Change Request; Spent Fuel Cask Handling Crane
  - (2) Letter from Mr. D. G. McDonald, Jr. (NRC) to Mr. G. C. Creel (BGE), dated January 17, 1992, Issuance of Amendment for Calvert Cliffs Nuclear Power Plant, Unit No. 1 (TAC No. M71241) and Unit 2 (TAC No. M71242)