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Davis-Besse

Docket Number 50-346

License Number NPF-3

Serial Number 2377

May 13, 1996

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555-0001

Subject: Response to NRC Bulletin 96-02, "Movement of Heavy Loads Over Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment," for the Davis-Besse Nuclear Power Station

Ladies and Gentlemen:

This letter provides the Toledo Edison (TE) response, for the Davis-Besse Nuclear Power Station (DBNPS), to Nuclear Regulatory Commission (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 (Log Number 1-3685).

The bulletin requested licensees to take the following actions:

Review plans and capabilities for handling heavy loads while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled) in accordance with existing regulatory guidelines. Determine whether the activities are within the licensing basis and, if necessary, submit a license amendment request. 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 and associated lifting devices) over fuel assemblies in the spent fuel pool.

The bulletin then requires licensees to submit responses as follows:

- (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 2 years from the date of this bulletin, provide the following:

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- 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.
- (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 (6-9 months) of the planned movement of the loads so as to afford the staff sufficient time to perform an appropriate review.
- (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.
- (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 spent fuel pool and submit the appropriate information in advance (6-9 months) of the planned movement of the loads for NRC review and approval.

Toledo Edison provides the following information:

- (1) Control of heavy loads at the DENPS was addressed in accordance with NUREG-0612, "Control of Heavy Loads at Power Plants," and the requirements of the generic letter dated December 22, 1980. The NRC issued a letter on October 29, 1984 that concluded that the Phase I guidelines of NUREG-0612 and the generic letter were satisfied and were considered to be resolved acceptably.

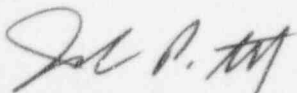
Toledo Edison completed review of the Phase II guidelines contained in the NUREG and generic letter, which was submitted June 10, 1983 (Serial Number 952).

At this time there are no plans to handle a heavy load over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at a power that does not satisfy the guidelines established in the NUREG-0612. Loads evaluated have been determined to be within the licensing basis of the DBNPS. Consequently, no license amendment request is projected.

- (2) No plans exist to handle heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power that has not been previously evaluated. Consequently, no license amendment request is projected.
- (3) Dry spent fuel storage dry run and fuel loading activities were conducted at the DBNPS between December 1, 1995 and January 10, 1996. The design of the DBNPS precludes the need to move a dry storage cask over spent fuel, fuel in the reactor core, or safety-related equipment because the storage cask is utilized in a cask pit next to the Spent Fuel Pool. The load path traveled by the storage cask for placement into the cask pit does not traverse the Spent Fuel Pool or safety-related equipment. Lifting of heavy loads during dry fuel storage activities was evaluated by TE in accordance with 10CFR72.212, 10CFR50.59, and 10CFR72.48. These evaluations included handling the dry storage canister shield plug over the loaded dry storage cask in the cask pit. These evaluations were subject to NRC inspection and are within the design basis of the DBNPS.
- (4) No plans exist to handle heavy loads over fuel assemblies in the spent fuel pool which are outside the DBNPS design basis that would necessitate submittal of a license amendment request.

Should you have any questions or require additional information, please contact Mr. James L. Freels, Manager - Regulatory Affairs, at (419) 321-8466.

Very truly yours,



DLM/llh

Enclosure

cc: L. L. Gundrum, NRC Project Manager
H. J. Miller, Regional Administrator, NRC Region III
S. Stasek, DB-1 Senior Resident Inspector
Utility Radiological Safety Board

Docket Number 50-346
License Number NPF-3
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Enclosure

RESPONSE TO NRC BULLETIN 96-02

FOR

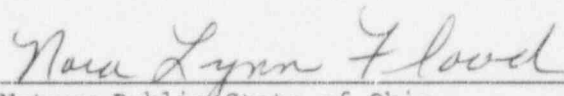
DAVIS-BESSE NUCLEAR POWER STATION

UNIT NUMBER 1

This letter is submitted pursuant to 10CFR50.54(f). Enclosed is Toledo Edison's response to NRC Bulletin 96-002, (Serial Number 2377) "Movement of Heavy Loads Over Spent Fuel, Over Fuel in the Reactor Core, or Over Safety-Related Equipment."

By: 
J. P. Stetz, Vice President - Nuclear

Sworn and subscribed before ^{me}~~by~~ this 13th day of May, 1996.


Notary Public State of Ohio
Nora Lynn Flood - My Commission expires
September 3, 1997.