



**Boston Edison**

Pilgrim Nuclear Power Station  
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Senior Vice President — Nuclear

May 28, 1996  
BECO Ltr. #2.96-053

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Docket No. 50-293  
License No. DPR-35

Pilgrim'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"

- References: 1) NUREG-0612, "Control of Heavy Loads at Power Plants," Resolution of Generic Technical Activity A-36, issued July 1980
- 2) 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
- 3) NRC Letter, "Control of Heavy Loads," dated December 22, 1980

NRC Bulletin (NRCB) 96-02 alerted licensees about concerns associated with the movement of heavy loads in various areas of nuclear power plants, especially over safety-related equipment. To address these concerns, NRCB 96-02 requested all licensees perform the following action:

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.

We are responding 30 days from the date we received NRCB 96-02, April 29, 1996, instead of the requested 30 days from issue. This date was negotiated with our NRR Project Manager.

Response

The concern of NUREG-0612 is that a load drop causes a radioactive material release to the environment or a loss of equipment necessary for safe shutdown. On July 13, 1983, Pilgrim submitted a response to NUREG-0612 that identified lifting devices, loads, load-paths, procedures, and technical specification changes in relation to this concern.

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We employ this document as our primary licensing basis concerning heavy loads. Heavy loads are identified and controlled by procedures. Our review of heavy-load procedures (3.M.1-14, 3.M.4-48 and 3.M.7.5) show them to be in compliance with our licensing basis and NUREG-0612. Changes to heavy load procedures would be addressed in the following ways to maintain compliance with this document:

- Heavy loads not identified in Pilgrim's licensing basis and procedures with the potential to impact irradiated fuel (regardless of plant operational mode) are not moved without a load-specific evaluation conducted by engineering. Heavy load evaluations are performed under 10 CFR 50.59 review and require review by our Operations Review Committee (ORC). Should such a heavy load evaluation identify an unreviewed safety issue, we would request NRC review via the appropriate mechanism.
- Heavy loads not identified in Pilgrim's licensing basis and procedures that do not have the potential to impact irradiated fuel are not moved without a load-specific evaluation by engineering and review by ORC.

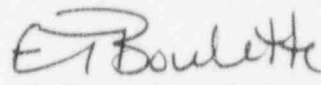
Our review of heavy loads technical specifications (sections 5.5.E and F) determined no changes are required.

Our review of Pilgrim's Updated Final Safety Analysis Report (sections 5, 7, and 10) determined no changes resulting from NRCB 96-02 are needed since no heavy load movements are planned that involve heavier loads, different load paths, or different potential consequences than those previously considered in the FSAR, licensing basis, or procedures.

We, therefore, find our present licensing basis, procedures, and controls satisfy the concerns of NRCB 96-02.

#### Commitment

Should the need arise to move an unevaluated heavy load meeting the conditions specified in NRCB 96-02, we will perform the actions in that bulletin.

  
E. T. Boulette, PhD

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Commonwealth of Massachusetts)  
County of Plymouth )

Then personally appeared before me, E. T. Boulette, who being duly sworn, did state that he is Senior Vice President - Nuclear of Boston Edison Company and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My commission expires: April 15, 1999  
DATE

  
NOTARY PUBLIC



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