



**CENTERIOR
ENERGY**

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May 13, 1996
PY-CEI/NRR-2653L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Perry Nuclear Power Plant
Docket No. 50-440
Response to NRC Bulletin 96-02 "Movement Of Heavy Loads Over Spent Fuel, Over Fuel In The Reactor Core, Or Over Safety-Related Equipment"

Gentlemen:

On April 11, 1996, the Nuclear Regulatory Commission (NRC) issued NRC Bulletin 96-02, on movement of heavy loads. 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," a 30 day report was required "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."

There are no currently identified needs for a heavy load lift over spent fuel, fuel in the reactor core, or safety-related equipment at power during the next two years. Should the need arise, the capability exists to evaluate the load and determine the appropriate handling requirements. As noted in the Perry Nuclear Power Plant (PNPP) Updated Safety Analysis Report (USAR) and licensing correspondence with the NRC, PNPP is committed to meeting the Phase 1 guidelines from NUREG-0612 for safe handling of heavy loads. A copy of the appropriate USAR section is provided in Attachment 1 to this letter. In summary, it notes that the NUREG-0612 guidelines are maintained through the use of maintenance procedures (which provide the necessary guidelines to ensure safe handling of heavy loads in the vicinity of spent fuel, safe shutdown, and decay heat removal equipment), engineering evaluations and approvals of defined safe load paths and rigging/lifting arrangements, training/qualification of crane operators, periodic testing/inspection of lifting equipment, and control of lifting devices in accordance with plant administrative procedures.

As stated above, the PNPP USAR describes the heavy loads program and notes that heavy load lifts are addressed through maintenance procedures/engineering evaluations to meet the applicable guidelines of NUREG-0612. Individual load drop accidents are not evaluated in the body of the USAR. The licensing basis for this issue, including the various correspondence letters on the PNPP docket and the USAR, identified that deviations from the originally evaluated loads/paths were anticipated over the life of the plant, and would be evaluated. Drafts of the maintenance procedures and instructions were submitted on the PNPP docket during the construction phase. NRC review of

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May 13, 1996

Page 2 of 2

the heavy loads program is documented in Section 9.1.5 of NUREG-0887, "Safety Evaluation Report related to the operation of Perry Nuclear Power Plant", and in its supplements (SSERs) 2 and 5.

Several sections of the Bulletin imply that load drop accidents that have "not previously been evaluated in the FSAR" may result in an unreviewed safety question and a resultant license amendment request. Based on the above described PNPP licensing basis permitting evaluations of individual heavy load lifts, it is anticipated that for loads "not previously evaluated", either an acceptable combination of rigging device and safe load path meeting the criteria of NUREG-0612 would be identified, or appropriate licensing actions would be pursued.

Based on the wording of the USAR and the information provided in the licensing correspondence on this issue, the existing heavy load lift program is considered to be within the PNPP licensing basis. Also, there are no currently identified needs to pursue any license amendments or Technical Specification changes related to movement of heavy loads.

The second, third and fourth items under the heading Required Response identify the NRC's requested lead times for reviews of any license amendment or Technical Specification change request, and identify specific information that should be included in any such submittals. There are no current plans for submitting license amendments or Technical Specification change requests for PNPP, therefore no specific response is provided for these items.

Feedback from the Nuclear Energy Institute (NEI) and the NRC Lead Project Manager for this issue identified that the Bulletin has raised questions throughout the industry on the intent of the positions stated therein. It has been indicated that clarifications to the Bulletin may be forthcoming from the NRC. The responses in this letter are based on interpretation of the Bulletin statements. The NRC Lead Project Manager requested that any statements from the Bulletin that raised questions during development of the response be identified. Clarification of such issues may be pursued through NEI. For example, use of the term "safety-related equipment" in the Bulletin differs from the original licensing basis terminology of "equipment required for safe shutdown or decay heat removal."

If you have questions or require additional information, please contact
Mr. James D. Kloosterman, Manager - Regulatory Affairs at (216) 280-5833.

Very truly yours,




for Donald C. Shelton

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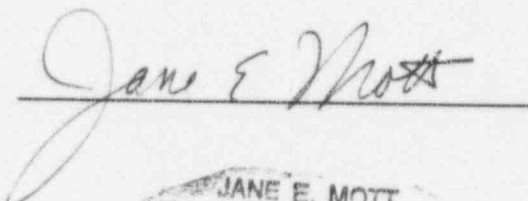
Attachment

cc: NRC Project Manager
NRC Resident Inspectors Office
NRC Region III

I, Robert W. Schrauder, being duly sworn state that (1) I am Director, Perry Nuclear Services Department of the Cleveland Electric Illuminating Company, (2) I am duly authorized to execute and file this certification on behalf of The Cleveland Electric Illuminating Company and Toledo Edison Company, and as the duly authorized agent for Duquesne Light Company, Ohio Edison Company, and Pennsylvania Power Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.


Robert W. Schrauder

Sworn to and subscribed before me, the 13th day of May,
1996.



JANE E. MOTT
Notary Public, State of Ohio
My Commission Expires Feb. 20, 2000
(Recorded in Lake County)

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9.1.4.5.4 Other

Refer to Table 9.1-7 for additional refueling and servicing equipment not requiring instrumentation.

9.1.4.5.5 Radiation Monitoring

The radiation monitoring equipment for the refueling and servicing equipment is discussed in Section 12.3.4.

9.1.5 CONTROL OF HEAVY LOADS NEAR SPENT FUEL AND OTHER CRITICAL
PLANT SYSTEMS/COMPONENTS

During the operational phase, compliance with the applicable guidelines of NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants," to reduce the potential of an uncontrolled movement or lowering of a heavy load is maintained by adherence to the following procedures and requirements:

- a. Maintenance procedures provide the necessary guidelines to ensure safe handling of heavy loads in the vicinity of spent fuel, safe shutdown, and decay heat removal equipment.
- b. Engineering evaluation and subsequent approval of a defined safe load path and rigging/lifting arrangement.
- c. Specified training/qualification of crane operators, periodic testing/inspection of lifting equipment and control of lifting devices in accordance with plant administrative procedures.

* 9.1.6 REFERENCES FOR SECTION 9.1

1. Martin, C.L., "Lattice Physics Methods," NEDO-20913, General Electric Co.
2. Programmed and Remote Systems Corporation (PAR) Document DC-3156-1 "Design and Fabrication Criteria, Spent Fuel Storage Racks," for Perry Nuclear Power Plant Units 1 and 2, Revision 2, dated November 30, 1979.
3. Gilbert Associates Inc. Report No. 232^o, "Control of Heavy Loads Study" for Perry Nuclear Power Plant Units 1 and 2, Revision 2, dated January 7, 1983.