

Log # TXX-96359
File # 10119
Ref. # NRCB 96-02

May 10, 1996

C. Lance Terry
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
NRC BULLETIN NO. 96-02: MOVEMENT OF HEAVY LOADS OVER SPENT
FUEL, OVER FUEL IN THE REACTOR CORE, OR OVER SAFETY-RELATED
EQUIPMENT

Gentlemen:

TU Electric has evaluated the concerns of the subject bulletin. The reporting requirements of the bulletin state that:

Requested Actions

To ensure that the handling of heavy loads is performed safely and within the conditions and requirements specified under Title 10 of the *Code of Federal Regulations*, all addressees are requested 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.

Required Response

Pursuant to Section 182a, the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f), all addressees must submit the following written information:

- (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.

In accordance with the bulletin requirements the following response is submitted.

Requested Actions

To ensure that the handling of heavy loads is performed safely and within the conditions and requirements specified under Title 10 of the *Code of Federal Regulations*, all addressees are requested 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.

TU Electric Response

TU Electric performed a review of 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 to determine if the activities are within the licensing basis. The review included NUREG-0612, Generic Letter 85-11 and TU Electric responses, applicable NRC Safety Evaluation Reports, and applicable sections of the CPSES Final Safety Analysis Report (FSAR). The review indicated that heavy load activities are currently in accordance with the CPSES licensing basis relative to handling of heavy loads, and therefore neither a license amendment request nor a change to the Technical Specifications is currently required.

Current CPSES design and procedures do not allow the handling of heavy loads over fuel assemblies in the spent fuel pool or over fuel in the reactor core. Therefore, a Technical Specification change is not currently required. However, as a result of the review, procedure enhancements were identified and will be implemented regarding the concerns in NRC Bulletin 96-02 related to CPSES handling of heavy loads over operating safety related equipment.

Required Response Item (1)

- (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:
 - * 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.

TU Electric Response

Current CPSES design and procedures do not allow the handling of heavy loads over fuel assemblies in the spent fuel or fuel in the reactor core; however, TU Electric plans to implement activities involving the handling of heavy loads over safety-related equipment within the next two years. As noted above, TU Electric performed a review of 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 to determine if the activities are within the licensing basis. The review included NUREG-0612, Generic Letter 85-11 and TU Electric responses, applicable NRC Safety Evaluation Reports, and applicable sections of the CPSES Final Safety Analysis Report (FSAR). The review indicated that heavy load activities are currently in accordance with the CPSES licensing basis relative to handling of heavy loads, and therefore neither a license amendment request nor a change to the Technical Specifications is currently required.

Current CPSES design and procedures do not allow the handling of heavy loads over fuel assemblies in the spent fuel pool or over fuel in the reactor core. Therefore, a Technical Specification change is not currently required. However, as a result of the review, procedure enhancements were identified and will be implemented regarding the concerns in NRC Bulletin 96-02 related to CPSES handling of heavy loads over operating safety related equipment.

Required Response Item (2)

- (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.

TU Electric Response

TU Electric does not currently plan 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) that involve a potential load drop accident that has not previously been evaluated in the CPSES licensing basis.

However, if such an activity is required to be performed in the future, a safety evaluation of the activity in accordance with 10CFR50.59 will be prepared and if the evaluation concludes that an unreviewed safety question exists, the activity will be provided in advance to the NRC for review and approval in accordance with 10CFR50.59.

Required Response Item (3)

- (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.

TU Electric Response

TU Electric does not currently plan to perform activities involving the movement of 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).

Required Response Item (4)

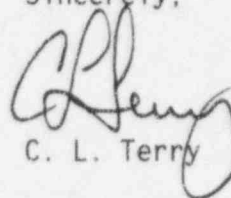
- (4) For licensees planning to perform activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled), determine whether changes to Technical Specifications 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.

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TU Electric Response

As noted in response to Item (1) above, current CPSES design and procedures do not allow the handling of heavy loads (e.g., the dry storage canister shield plug) over fuel assemblies in the spent fuel pool. Therefore, a Technical Specification change is not currently required.

Sincerely,



C. L. Terry

GLM/glm

cc: Mr. L. J. Callan, Region IV
Ms. L. J. Smith, Region IV
Resident Inspectors, CPSES