



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

September 9, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Zion Nuclear Power Station Units 1 and 2
Control of Heavy Loads ³⁰⁴
NRC Docket Nos. 50-295 and 50-204

References (a): July 27, 1983 letter from F. G. Lentine
to H. R. Denton.

(b): March 22, 1984 letter from S. A. Varga
to D. L. Farrar.

Dear Mr. Denton:

Reference (a) transmitted Commonwealth Edison Company's response to the draft Technical Evaluation Report on Control of Heavy Loads that had been prepared by the Franklin Research Center. This response contained a commitment to move heavy loads only under "the direction of the maintenance foreman or fuel handling foreman who has the load movement procedure available for his reference during the load movement."

The commitment was made in lieu of physically marking the safe load paths on the floor or grating. The Franklin Research Center concluded in Reference (b) that although Zion Station does not mark safe load paths, the use of load handling supervisors who refer to written procedures or drawings to guide the crane operator accomplishes the same objectives as using permanent markings.

Since the preparation of reference (a), the need to expand the number of qualified "load handling supervisors" to include personnel other than maintenance or fuel handling foreman has become apparent. The demands on these individual's time can be large and varied. Thus, the requirement to have these specific individuals present throughout all heavy load movements can be restrictive to the overall operation of the plant.

Commonwealth Edison believes that the intent of references (a) and (b) regarding this issue is to require that a trained, competent individual be assigned the specific responsibility to restrict the movement of a heavy load to within the defined safe load paths. This individual accomplishes this task by reference to an approved load movement procedure in his possession. He also is not preoccupied with the actual crane operation, since that function is assigned to someone other than the "load handling supervisor."

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Thus, Commonwealth Edison intends to expand Zion Station's definition of "Load Handling Supervisor" to include mechanics who have been trained in the application of safe load paths for the movement of heavy loads. The appropriate maintenance and fuel handling procedures are being revised to include these individuals as the supervisors of heavy load movements.

Zion Station expects to implement this policy change by September 20, 1985. If any questions arise regarding this issue, please direct them to this office.

Very truly yours,

Peter LeBlond

P. C. LeBlond
Nuclear Licensing Administrator

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cc: Region III Inspector - Zion
J. A. Norris - NRR

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