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JPN-85-84

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Mr. Domenic B. Vassallo, Chief  
Operating Reactors Branch No. 2  
Division of Licensing

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Control of Heavy Loads

- References:
1. NYPA letter, J.P. Bayne to D.B. Vassallo, dated January 31, 1984 (JPN-84-06).
  2. PASNY letter, J. P. Bayne to T. A. Ippolito, dated October 15, 1981 (JPN-81-82).
  3. NRC letter, D.B. Vassallo to C.A. McNeill, Jr. dated February 11, 1985.

Dear Sir:

Reference 1 documented agreements made during an October 7, 1982 conference call between your staff and Authority personnel regarding the handling and control of heavy loads at the FitzPatrick Plant. These agreements supplemented the Authority's NUREG-0612 phase I submittal (Reference 2). Specifically, Item No. VI, "Interim Protection Measure I", committed to revise the FitzPatrick Technical Specifications to prohibit handling of heavy loads over irradiated fuel in the spent fuel pool, until additional measures could be implemented to satisfy the guidelines of NUREG-0612.

The Authority has implemented procedures to control movement of heavy loads over irradiated fuel or in proximity to equipment associated with redundant shutdown paths. Maintenance Procedure No. MP-17.2, "Operations for Handling Heavy Loads", specifies the requirements necessary for safely lifting each heavy load that could potentially affect safe shutdown equipment or irradiated fuel. This procedure assures a high degree of safety and compliance with NUREG-0612.

For example, the reactor building crane has automatic and administrative means to restrict the movement of heavy loads over the spent fuel pool area. Six (6) travel limit switches/interlocks are utilized to prohibit movement of the bridge or trolley over the

spent fuel storage area. The bridge limit switches are interlocked with the trolley limit switches and the trolley limit switches are interlocked with the bridge limit switches. These limit switches and interlocks will prevent or allow movement of the hooks over the spent fuel pool area depending on the mode of operation. Operation of these limit switches/interlocks are further described in Supplement 20 of the original Final Safety Analysis Report.

In the event of failure of the limit switches/interlocks, movement of the heavy load over the spent fuel pool would be prevented by the following:

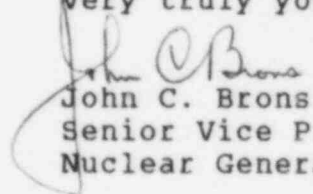
- Heavy load handling procedures prohibit handling of heavy loads over the fuel pool area, and the operators are trained in compliance with the procedures;
- The heavy load handling supervisor shall be present on the refueling floor during crane operations or safe load paths shall be identified by floor markings prior to making a lift over 750 pounds; and
- Hooks, slings and cables meet applicable ANSI standards which assures that they are safe to use.

Incorporating a statement which prohibits movement of heavy loads over irradiated fuel into the FitzPatrick Technical Specifications will not increase the level of safety already provided by the limit switches/interlocks and plant procedures. Therefore, the Authority hereby withdraws its commitment to include these requirements in the technical specifications. This was discussed in a telephone conversation between Messrs. H. Abelson and A. Singh of your staff and Mr. J.A. Gray of my staff, on September 12, 1985. Your staff concurred with this change to the Authority's commitment.

We would also like to clarify a minor error associated with the NRC's Control of Heavy Loads Technical Evaluation Report (Reference 3). Specifically Section 2.1.1a on page 8, inadvertently categorized the motor generator (M-G) set crane as a sole-purpose handling system used only when safety related equipment is out of service. This item should have been classified as a multipurpose use crane which was excluded from consideration within the scope of NUREG-0612 (Reference 2).

If you have any questions regarding this matter, please contact Mr. J.A. Gray, Jr. of my staff.

Very truly yours,

  
John C. Brons  
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