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March 23, 2001  
JAFP-01-0064

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Stop O-P1-17  
Washington, D.C. 20555

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333

**Change to Commitment Made in 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. NYPA Letter, M. J. Colomb to the NRC, Response to NRC Bulletin 96-02, (JAFP-96-0200), dated May 10, 1996.
  2. NRC Letter to Mr. William J. Cahill, Jr., "Request for Additional Information in Regarding NRC Bulletin 96-02," (TAC NO. M97448) dated January 9, 1997.
  3. NYPA Letter, M. J. Colomb to the NRC, Response to Request for Additional Information Regarding NRC Bulletin 96-02, (JAFP-97-0083), dated March 5, 1997.

Dear Sir:

The James A. FitzPatrick Nuclear Power Plant (JAFNPP) is revising a commitment made in Reference 1 and completing a commitment in Reference 3. Specifically, JAFNPP previously committed to submit a Technical Specification (TS) amendment to the NRC six to nine months prior to moving spent fuel storage casks at power. At the time of the bulletin response, the JAFNPP reactor building crane was not "single-failure-proof". JAFNPP has completed a reactor building crane upgrade modification to a "single-failure-proof" crane, therefore a cask drop event is no longer considered credible. The use of a "single-failure-proof" crane precludes the need for a load drop analysis associated with the movement of a dry storage cask per NUREG-0612. Due to the upgrade of the reactor building crane to "single-failure-proof", JAFNPP has concluded no change to the TS will be required in order to allow the handling of heavy loads, such as moving storage casks in the spent fuel pool and reactor building. This constitutes a change in the commitment documented in Reference 1. JAFNPP has concluded that no safety concerns exist with this commitment change.

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The reactor building crane has been modified to conform with the "single-failure-proof" requirements of Section 5.1 of NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants", (Reference 4) and NUREG-0554 (Reference 11). The reactor building crane is designed so that a single failure will not result in the loss of the capability to safely retain the load.

The Ederer designed trolley and hoist system that is installed at JAFNPP is described in Ederer Incorporated Generic Licensing Topical Report (EDR-1 (P) – A), entitled "Ederer's Nuclear Safety-Related Extra Safety and Monitoring (X-SAM) Cranes," Revision 3 (Reference 5). The Topical Report describes the design and testing of the "single-failure-proof" features which are included in Ederer's X-SAM cranes intended for handling spent fuel casks and other safety-related loads in a nuclear plant. By letter dated January 2, 1980 (Reference 6), NRC issued a Topical Report evaluation concluding that "...the design features described in the topical report [Revision 1] are acceptable for assuring that a single failure will not result in the loss of capability to safely retain a critical load." This was later updated by a NRC Safety Evaluation Report (SER) issued on August 23, 1983 (Reference 7).

The 125-ton reactor building crane upgrade was completed under a plant modification (Reference 8) and evaluated to the provisions of 10 CFR 50.59. The completed nuclear safety evaluation (Reference 9) concludes that the upgraded 125-ton reactor building crane meets the criteria for a "single-failure-proof" crane as outlined in NUREG-0554 (Reference 11) and meets the guidelines of Section 5.1 of NUREG-0612 (Reference 4). The modified crane has the ability to handle critical heavy loads without the possibility of a single failure of a component creating the loss of load control. Therefore, the scenario described in the RAI dated January 9, 1997 (Reference 2) is not credible at JAFNPP with the modified 125-ton "single-failure-proof" crane. In addition to the safety evaluation (Reference 9), JAFNPP completed an evaluation (Reference 10) of the load path and dry storage cask handling processes and concluded the planned heavy load handling activities can be performed safely with the upgraded "single-failure-proof" crane. This evaluation completes the commitment made in Reference 3, in response to the NRC RAI (Reference 2).

If you have any questions, please contact Mr. G. Tasick at (315) 349-6572.

Very truly yours,



T. A. Sullivan  
Vice President, Operations – JAF

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Cc: next page

Attachments (2)

Cc: USNRC Regional Administrator  
U.S. Nuclear Regulatory Commission  
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Mr. Guy Vissing, Project Manager  
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**LIST OF COMMITMENTS**

<b>Commitment No.</b>	<b>Description</b>	<b>Due Date</b>
JAFP-96-0200-02	Submit an amendment request prior to moving dry storage casks at power, including a statement of the capability of performing the actions necessary for safe shutdown in the presence of the 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.	Not required
JAFP-97-0083-01	<p>Provide the NRC staff with the following information regarding the movement of spent fuel storage casks at power:</p> <ol style="list-style-type: none"><li>1. An evaluation of the FitzPatrick crane design, load path, and cask loading and unloading processes that supports a determination that the scenario described in the RAI dated 01/09/97 is not credible at FitzPatrick.</li></ol>	Completed

**LIST OF REFERENCES**

- 1.) NYPA Letter, M. J. Colomb to the NRC, Response to NRC Bulletin 96-02, (JAFP-96-0200), dated May 10, 1996
- 2.) NRC Letter, Request for Additional Information in Regarding NRC Bulletin 96-02, dated January 9, 1997.
- 3.) NYPA Letter, M. J. Colomb to the NRC, Response to Request for Additional Information Regarding NRC Bulletin 96-02, dated March 5, 1997.
- 4.) Control of Heavy Loads at Nuclear Plants, July 1980, NUREG – 0612.
- 5.) Ederer Generic Licensing Topical Report, 10/08/82, EDR-1 (P)-A Revision 3
- 6.) Letter from Mr. R. L. Baer (NRC) to Mr. C. W. Clark, Jr. (Ederer), dated January 2, 1980. Review and Acceptance of Topical Report EDR-1, Revision 1.
- 7.) NRC letter from C.O. Thomas, Chief Standardization & Projects Branch Division of Licensing, Nuclear Regulatory Commission to C. W. Clark, Jr., Director of Engineering, Ederer Incorporated, dated August 23, 1983, Acceptance of Ederer Topical Report EDR-1.
- 8.) Reactor Building Crane Upgrade Modification, F1-91-270, Revision 0.
- 9.) JAF Nuclear Safety Evaluation, JAF-SE-99-002, Revision 3 dated December 27, 1999, Reactor Building Crane Upgrade.
- 10.) Evaluation of the Reactor Building Crane Design/Cask Handling, Engineering Report, JAF-RPT-HST-04099, dated February 9, 2001.
- 11.) Single-Failure-Proof Cranes for Nuclear Power Plants, May 1979, NUREG-0554