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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Reply to Request for Comments on Draft Response to Task Interface Agreement Concerning the Reactor Building Crane and Heavy Loads Handling

Reference: Letter from U. S. NRC to J. L. Skolds (Exelon Generation Company, LLC), "Dresden Nuclear Power Station, Units 2 and 3 – Draft Response to Task Interface Agreement 2001-13 Concerning the Reactor Building Crane and Heavy Loads Handling," dated September 11, 2002

In the referenced letter, the NRC provided a draft response to a Task Interface Agreement (TIA) to Exelon Generation Company, LLC (Exelon) and gave Exelon the opportunity to identify any technical errors or relevant information that was not considered in the draft TIA response. The attachment to this letter provides our comments on this draft TIA response.

In a teleconference between Mr. L. W. Rossbach of the NRC and Mr. A. R. Haeger of Exelon, it was agreed that our comments would be provided by November 11, 2002.

Should you have any questions concerning this letter, please contact Mr. Allan R. Haeger at (630) 657-2807.

Respectfully,



Patrick R. Simpson
Manager – Licensing
Mid-West Regional Operating Group

Attachment

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Dresden Nuclear Power Station

A001

Attachment
**Reply to Request for Comments on Draft Response to Task Interface Agreement
Concerning the Reactor Building Crane and Heavy Loads Handling**

Background

In a letter from the U. S. NRC to J. L. Skolds (Exelon Generation Company, LLC), "Dresden Nuclear Power Station, Units 2 and 3 – Draft Response to Task Interface Agreement 2001-13 Concerning the Reactor Building Crane and Heavy Loads Handling," dated September 11, 2002, the NRC reached conclusions regarding the licensing basis for Dresden Nuclear Power Station (DNPS) concerning heavy loads handling. The letter provided Exelon with the opportunity to identify any technical errors or relevant information that was not considered in the draft response.

Response

Exelon has reviewed the draft task interface agreement (TIA) response and provides the following comment on the conclusions stated in the draft TIA response in the following sections.

Section 3.1

"In the SER, the staff stated that the reactor building crane met the intent of the requirements in BTP APCS 9-1 for handling heavy loads weighing up to 100 tons ... "

Section 3.2.1

"Following restoration of the reactor building crane to conform to its original licensing basis, the licensee is prohibited from lifting loads exceeding 100 tons as a 'single failure-proof' crane."

Section 3.2.3 (F)

"As stated in Sections 3.1 and 3.2.1 above, the single-failure licensing basis for the Dresden reactor building crane requires that the loads be carried within the established controlled area (or a safe load path) and that they do not exceed 100 tons, which includes the weight of the lifting apparatus."

Additionally, a number of other sections refer to the single-failure-proof capacity of the crane as 100 tons.

In References 1 and 2, Commonwealth Edison (ComEd) Company, now Exelon, requested approval for Dresden Nuclear Power Station (DNPS) to handle spent fuel shipping casks weighing nominally up to 100 tons with the handling system described in reports attached to References 1 and 2. The handling system described in the reports includes a description of the lifting rig for the casks, and evaluates acceptability of this lifting rig. The weight of the lifting rig was specified to be 10 tons. In Reference 3, the NRC Safety Evaluation (SE) stated, "...we conclude that the overhead crane handling system and proposed spent fuel cask handling Technical Specifications meet our requirements and are acceptable for handling spent fuel casks weighing up to 100 tons." Exelon concludes from this SE that for handling spent fuel casks, the licensing basis recognizes that the total crane lifted load would be 110 tons (i.e., the weight of the cask and lifting apparatus).

Exelon considers the References 1 and 2 submittals and the Reference 3 NRC approval to have evaluated the reactor building crane as a 125-ton single failure proof crane and, separately, to have evaluated the cask handling devices and cask handling Technical

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Specifications. This understanding is consistent with the information in References 1 and 2, which demonstrated that the crane met the required factors of safety as specified in BTP 9-1 based on a 125-ton load. This is also consistent with statements in Reference 3, which concluded that the integrated design of the crane controls and cask lifting devices meets the intent of BTP 9-1.

However, Exelon understands that the licensing basis regarding this issue is subject to interpretation. In order to provide a long-term resolution of this matter, we plan to submit a license amendment request to clarify the licensing basis regarding the single-failure-proof rating of the reactor building crane. Until this planned license amendment request is approved, Exelon has concluded that the licensing basis clearly supports lifting loads of up to 110 tons with the reactor building crane as a single-failure-proof crane. This conclusion was discussed in a teleconference between members of the NRC and members of Exelon on September 13, 2002.

Exelon provides the following additional comments regarding the draft TIA response. These comments do not affect the general conclusions of the draft TIA response, but are provided to clarify or make minor corrections.

- The TIA and draft response imply that three modifications described in Reference 3 (i.e., the redundant mechanical limit switch in the main hoist power circuit, the electrical interlock system, and the capability for slow speed hoisting) may not have been installed or remained functional. Section 3.2.4 of the TIA response states, "This circumstance [i.e., failure to complete or maintain the modifications] should be corrected, and the licensee should be required to complete the modifications prior to moving casks. Accordingly, the licensee should be required to implement and maintain the overhead handling system modifications and re-evaluate its NUREG-0612 commitments to operate the crane within its design and licensing basis."

DNPS personnel have verified that the three modifications discussed are installed and functional, with the understanding that in Reference 3 the NRC approved an alternative modification that provided equivalent capability for slow speed hoisting. In addition, a ComEd submittal in 1991 (Reference 4) stated that these modifications had been installed. Exelon suggests that the TIA response clarify that the modifications are currently installed and functional.

Additionally the statement regarding re-evaluation of NUREG-0612 commitments is unclear in this context. Exelon suggests that this portion of the section be clarified.

- In Section 3.1, the second paragraph of the draft TIA response states that the November 8, 1974, letter (Reference 1) proposed certain modifications to the handling system to make it "single-failure-proof" for handling loads up to 100 tons.

The Reference 1 letter stated the following:

"Your approval is requested to handle spent fuel shipping casks weighing up to nominally 100 tons with the handling system described in the attached special reports."

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Exelon suggests that this paragraph of the TIA response be clarified.

- In Section 3.1, the last paragraph of the draft TIA response discusses ComEd's response to NRC Bulletin 96-02 and states, "the licensee stated that, in the future, prior to moving heavy loads [emphasis added] with the reactor in power operation, the licensee would demonstrate the capability of performing actions necessary to achieve safe shutdown following a dropped load inside the facility."

The ComEd response to Bulletin 96-02 stated that this capability would be demonstrated prior to moving dry storage casks over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power. The draft TIA response appears to broaden the intent of the ComEd NRC Bulletin 96-02 response. Additionally, in 2001 (Reference 5), Exelon notified the NRC of a commitment change to clarify its response to Bulletin 96-02. This commitment change was based on Exelon's understanding that the reactor building crane was single-failure-proof, and that load drop analyses would therefore not be required for spent fuel cask handling. Exelon suggests that this paragraph of the draft TIA response be clarified.

- In Section 3.2.1, the TIA response states, "Any loads lifted above 100 tons should be analyzed following the guidelines of NUREG-0612, Section 5.1.1(2),"

The reference to NUREG-0612 should be to Section 5.1.4(2).

References

1. Letter from J. S. Abel (Commonwealth Edison Company) to U. S. NRC, "Dresden Station Units 2 and 3, Quad Cities Station Units 1 and 2, Dresden Special Report No. 41, Quad Cities Special Report No. 16, 'Reactor Building Crane and Cask Yoke Assembly Modifications,' AEC Dckt. 50-237, 50-249, 50-254 and 50-265," dated November 8, 1974
2. Letter from J. S. Abel (Commonwealth Edison Company) to U. S. NRC, "Dresden Station Units 2 and 3, Quad Cities Station Units 1 and 2, Dresden Special Report No. 41, Supplement A, Quad Cities Special Report No. 16 – Supplement A, 'Reactor Building Crane and Cask Yoke Assembly Modifications,' NRC Dckts. 50-237, 50-249, 50-254 and 50-265," dated June 3, 1975
3. Letter from U. S. NRC to R. L. Bolger (Commonwealth Edison Company), dated June 3, 1976
4. Letter from M. H. Richter (Commonwealth Edison Company) to U. S. NRC, "Dresden Nuclear Power Station Units 2 and 3; Application for Amendment to Facility Operating Licenses DPR-19 and DPR-25, Appendix A, Technical Specifications," dated August 9, 1991
5. Letter from P. Swafford (Exelon Generation Company, LLC) to U. S. NRC, "2001 Regulatory Commitment Change Summary Report," dated March 21, 2002