



NUCLEAR ENERGY INSTITUTE

Anthony R. Pietrangelo
VICE PRESIDENT
REGULATORY AFFAIRS

July 28, 2008

Mr. Eric J. Leeds
Director, Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Initiative on Control of Heavy Loads

Project Number: 689

Dear Mr. Leeds:

On September 14, 2007, the nuclear industry's Nuclear Strategic Issues Advisory Committee approved an industry initiative to address NRC staff concerns regarding the interpretation and implementation of regulatory guidance associated with heavy load lifts. While there had been no significant events associated with heavy load lifts, NRC and industry identified a lack of consistency in plant licensing bases that pertain to this issue. The formal industry initiative specifies actions each plant will take to ensure that heavy load lifts continue to be conducted safely and that plant licensing bases accurately reflect plant practices.

The nuclear industry has completed its guidance for the implementation of the industry initiative. Attached to this letter for your information is NEI 08-05, Industry Initiative on Control of Heavy Loads. This document includes guidance to the industry on (1) maintenance rule (a) (4) administrative controls; (2) industry criteria for reactor vessel load drop and consequence analysis; (3) reactor head lift single failure proof crane equivalence; and (4) updating the Final Safety Analysis Report. We previously provided you with sections (2) and (3) on April 17 and April 22, respectively.

We are confident that implementation of the heavy load initiative will provide improved safety in the movement of heavy loads at nuclear power plants and will also achieve our objective of providing a more formally documented licensing basis. Our guidelines were developed by a task force of industry experts and benefited from numerous public meetings with NRC staff. We appreciated your letters of May 16 and May 27; however, we continue to believe that the load drop acceptance criteria detailed in NEI 08-05 are appropriate for a realistic, best estimate analysis of a non-design basis event, such as a reactor vessel head drop. The second attachment provides the technical basis for the criteria.

Mr. Eric J. Leeds

July 28, 2008

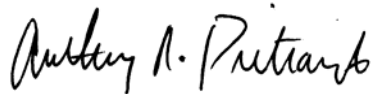
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We have distributed NEI 08-05 to the industry for implementation. Many of the actions required by the initiative have already been completed in accordance with the timeline established in the initiative.

In closing, we believe this effort provides an excellent example of addressing a generic concern in an expeditious and effective manner. We hope other emerging issues can be dealt with in an equally successful way.

Please contact me at (202) 739-8081, arp@nei.org or Tom Houghton at (202) 739-8107, tch@nei.org if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Anthony R. Pietrangelo". The signature is written in a cursive, flowing style.

Anthony R. Pietrangelo

Attachments

c: Mr. Steven R. Jones, NRC
Mr. Douglas G. Huyck, NRC
Mr. William H. Ruland, NRC