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SUBJECT: Responds to 801222 request for review of heavy loads & comparison w/NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants." Heavy load training program & procedures & electrical interlock provisions to be implemented by 820401.

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WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

August 17, 1981

Mr. Darrell G. Eisenhut, Director
 Division of Licensing
 U. S. Nuclear Regulatory Commission
 Washington, D. C. 20555

Dear Mr. Eisenhut:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
Control of Heavy Loads



Your letter dated December 22, 1980, requested we review our controls for the handling of heavy loads and compare them with the guidelines of NUREG-0612 "Control of Heavy Loads at Nuclear Power Plants," to determine the extent they are presently satisfied. You further requested we identify the changes and modifications that would be required to fully satisfy these guidelines.

Our response treats the actions which we have found necessary as a result of our review of NUREG-0612. You will note that we have deviated from the format you had requested. Our response provides you with the programs which we will incorporate to improve our capability of handling heavy loads. This response delineates those areas that need change or improvement. Our record of handling heavy loads shows that we had no accidents, failures, etc., which have caused or threatened the health and safety of the public, and on that basis alone our program does not require an extensive overhaul. However, NUREG-0612 does point out specifics that could be used to improve upon our operation and control of heavy loads at Kewaunee.

The most cost-effective areas of the many guidelines recommended in NUREG-0612 are those of training and procedures. To this end, we are in the process of developing a formalized training program in two segments which are crane operation and load rigging. The operation portion will encompass the important aspects of the applicable ANSI and OSHA criteria on a plant specific basis.

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The program will train the crane operator to understand as well as to manipulate heavy or light loads safely. The operator will receive training and supervision from experienced personnel prior to heavy load operations. Further, the training program will delineate areas of the plant in which operation of heavy loads is to be minimized or prohibited and precautions to observe if operating in those areas becomes necessary. The rigging portion will also deal with applicable ANSI and OSHA standards. The main emphasis will be on the proper techniques to rig a load and the use of correct equipment for the application.

Training and procedures will provide assurance that heavy loads are not transported over critical areas. In addition, some cranes have or will be provided with electrical interlocks as further increased confidence that loads remain within designated safe load areas.

It may become necessary to deviate from the safe load areas occasionally, thus reducing the margin of safety insured by the specified locations in which to operate these heavy loads. For these instances, administrative controls will be implemented before proceeding. As a minimum these will include: the Plant Operations Review Committee (PORC) to review and approve any such deviations from stated safe load areas. The committee may require a procedure, contingency plan and/or drawings or sketches to fully delineate the means for the successful completion of the load-handling operation. A responsible individual will oversee the operation to ensure its success in accordance with the PORC requirements. In some cases it may be necessary to provide redundant rigging (cables and hoists) to insure safe handling in crucial areas. The installation of new fuel racks in the spent fuel pool would be an example where this methodology would apply.

Procedures will be implemented for the control of heavy loads throughout the critical areas. Some procedures are already in effect while others need to be developed. The purpose of these procedures will alert the crane operators and plant personnel of the precautions and limitations of the crane they are using to handle the heavy load, the associated rigging criteria and preferred areas in which to operate.

In summary, we will provide a heavy load handling training program, procedures for handling heavy loads through critical areas and provide electrical interlocks to ensure that loads are within safe load designated areas. The intention of these action items is to minimize heavy loads in critical areas, to handle these loads in a safe manner and to increase the awareness of the plant personnel of the need of adequate controls near spent fuel and safety-related equipment. These items will be implemented by April 1, 1982, prior to our next refueling outage.

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By October 9, 1981, we will provide details of the programs described herein.

Sincerely,



E. R. Mathews, Senior Vice President
Power Supply and Engineering

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cc - Mr. Robert Nelson, NRC Resident Inspector
RR #1, Box 999, Kewaunee, WI 54216