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 DENTON, H. Office of Nuclear Reactor Regulation, Director

SUBJECT: Informs that equipment layout drawings have been utilized to develop load paths described in procedures, in response to NRC 810203. 1tr. In some cases drawings have been included to enhance procedure.

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 TITLE: Control of Heavy Loads Near Spent Fuel (USI A-36)

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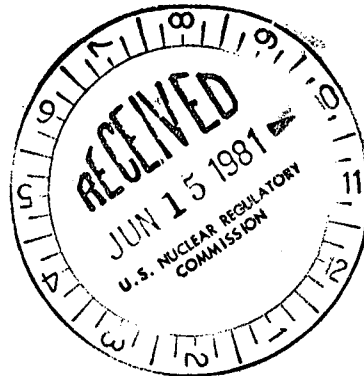
Iowa Electric Light and Power Company

June 5, 1981

LDR-81-186

LARRY D. ROOT
ASSISTANT VICE PRESIDENT
OF NUCLEAR DIVISION

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Denton:

With regard to Mr. Eisenhower's letter dated February 3, 1981, concerning control of heavy loads near spent fuel, we have implemented the interim actions that were required by May 15, 1981. However, we feel that some explanation is appropriate with respect to this implementation.

Section 5.1.1(1) of NUREG 0612 states that, ".....load paths should be defined in procedures, shown on equipment layout drawings, and clearly marked on the floor in the area where the load is to be handled. Deviations from defined load paths should require written alternative procedures approved by the plant safety review committee."

We have utilized equipment layout drawings to develop load paths described in the procedures and in some cases drawings have been included to enhance the procedure. However, with regard to the utilization of floor markings, we have determined that method would be impractical in areas such as the refueling floor because of the many heavy loads which must be moved. Markings would result in a maze which would tend to confuse the operators, therefore, we have not utilized that technique in our implementation of control.

We have interpreted the ".....plant safety review committee....." of the NUREG to be equivalent to our plant operations committee. This is appropriate at the Duane Arnold Energy Center because it is the plant Operations Committee which has control over all operations procedures.

If you have any questions regarding this explanation, we would be pleased to discuss them with you.

Very truly yours,

Larry D. Root

Larry D. Root
Assistant Vice President
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LDR/RS/kmc

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