

Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701

ComEd

May 13, 1996

U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attention: Document Control Desk

Subject: Braidwood Station Units 1 and 2
Byron Station Units 1 and 2
Dresden Station Units 2, and 3
LaSalle County Station Units 1 and 2
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2

Commonwealth Edison Company (ComEd) Response to NRC Bulletin 96-02, "MOVEMENT OF HEAVY LOADS OVER SPENT FUEL, OVER FUEL IN THE REACTOR CORE, OR OVER SAFETY-RELATED EQUIPMENT," dated April 11, 1996.

NRC Dockets 50-454 and 50-455
NRC Dockets 50-456 and 50-457
NRC Dockets 50-237 and 50-249
NRC Dockets 50-373 and 50-374
NRC Dockets 50-254 and 50-265
NRC Dockets 50-295 and 50-304

Reference: NRC Bulletin 96-02, " MOVEMENT OF HEAVY LOADS OVER SPENT FUEL, OVER FUEL IN THE REACTOR CORE, OR OVER SAFETY-RELATED EQUIPMENT," dated April 11, 1996.

In the Referenced letter, the NRC staff alerted licensees about concerns associated with the movement of heavy loads in various areas of nuclear power plants, especially over safety-related equipment. To address these concerns, the NRC staff has determined that licensees may not have yet adequately addressed this issue and further action was necessary. In NRC Bulletin 96-02, the NRC staff requested that all licensees implement the following action:

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"Review plans and capabilities for handling heavy loads while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled) in accordance with existing regulatory guidelines. Determine whether the activities are within the licensing basis and, if necessary, submit a license amendment request. Determine whether changes to Technical Specifications will be required in order to allow the handling of heavy loads (e.g., the dry storage canister shield plug and associated lifting devices) over fuel assemblies in the spent fuel pool."

In addition to the above actions, the NRC staff requested licensees to submit the following written information:

- (1) *For licensees planning to implement activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment within the next 2 years from the date of this bulletin, provide the following:*

A report, within 30 days of the date of this bulletin, that addresses the licensee's review of its plans and capabilities to handle heavy loads while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled) in accordance with existing regulatory guidelines. The report should also indicate whether the activities are within the licensing basis and should include, if necessary, a schedule for submission of a license amendment request. Additionally, the report should indicate whether changes to Technical Specifications will be required.

- (2) *For licensees planning to perform activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled) and that involve a potential load drop accident that has not previously been evaluated in the FSAR, submit a license amendment request in advance (6-9 months) of the planned movement of the loads so as to afford the staff sufficient time to perform an appropriate review.*
- (3) *For licensees planning to move dry storage casks over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled) include in item 2 above, a statement of the capability of performing the actions necessary for safe shutdown in the presence of 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.*

- (4) *For licensees planning to perform activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled), determine whether changes to Technical Specifications will be required in order to allow the handling of heavy loads (e.g., the dry storage canister shield plug) over fuel assemblies in the spent fuel pool and submit the appropriate information in advance (6-9 months) of the planned movement of the loads for NRC review and approval.*

ComEd Response and Commitments: NRC Bulletin 96-02

- **ComEd has reviewed NRC Bulletin 96-02. At each of our six stations, ComEd has reviewed the plans and capabilities for handling heavy loads while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled) in accordance with existing regulatory guidelines. ComEd has determined that the activities are within the current licensing basis for each of our six stations. In addition, based upon the current composition of site Technical Specifications, ComEd has determined that changes to Technical Specifications would be required in order to allow the handling of heavy loads (e.g., the dry storage canister shield plug and associated lifting devices) over fuel assemblies in the spent fuel pool, although such activities are not currently planned. However, upon approval and implementation of Technical Specification upgrades (currently ongoing at each of ComEd's sites), Technical Specification changes would not be required as such requirements are relocated from the Technical Specifications.**

Current plans at ComEd do not include the implementation of activities involving the handling of heavy loads over the spent fuel pool, fuel in the reactor core, or safety-related equipment which result in the potential for an unreviewed safety question per the provisions of 10 CFR 50.59, prior to April 11, 1998 (two years from the date of NRC Bulletin 96-02).

ComEd steam generator replacements at Byron and Braidwood (SGR) will necessitate moving the steam generator and support equipment qualifying as heavy loads. These activities are anticipated to be bounded by current licensing analyses. More detailed SGR project planning will include evaluations under 10 CFR 50.59 to determine if unreviewed safety questions exist. Any unreviewed safety question will be dispositioned as described in response to this Bulletin.

- **For activities involving the handling of heavy loads that result in an unreviewed safety question per the provisions of 10 CFR 50.59, ComEd will submit a license**

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amendment request in advance of the planned movement of the loads so as to afford the staff sufficient time to perform an appropriate review.

- ComEd currently has no plans for any movement of dry storage casks over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling and defueled). However, should such movements be planned in the future, ComEd will demonstrate 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.
- For activities involving the handling of heavy loads over spent fuel, fuel in the reactor core, or safety-related equipment while the reactor is at power (in all modes other than cold shutdown, refueling, and defueled), based upon the current composition of site Technical Specifications, ComEd has determined that changes to Technical Specifications would be required in order to allow the handling of heavy loads (e.g., the dry storage canister shield plug) over assemblies in the spent fuel pool, although such activities are not currently planned. However, upon approval and implementation of Technical Specification upgrades (currently ongoing at each of ComEd's sites), Technical Specification changes would not be required as such limits are relocated from the Technical Specifications.

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

Please direct any questions concerning this response to this office.

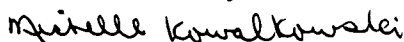
Sincerely,

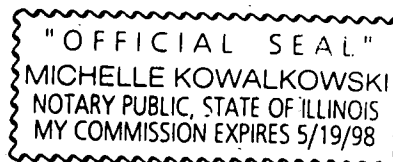

John B. Hosmer
Vice President

Signed before me on this 13th day,

of May, 1996.

Notary Public





cc: H. Miller, Regional Administrator-RIII
J. Jacobson, Region III
R. Capra, Director of Directorate III-2, NRR
G. Dick, Byron Project Manager, NRR
R. Assa, Braidwood Project Manager, NRR
J. Stang, Dresden Project Manager, NRR
D. Skay, LaSalle Project Manager, NRR
R. Pulsifer, Quad Cities Project Manager, NRR
C. Shiraki, Zion Project Manager, NRR
C. Phillips, Senior Resident Inspector (Braidwood)
H. Peterson, Senior Resident Inspector (Byron)
C. Vanderniet, Senior Resident Inspector (Dresden)
P. Brochman, Senior Resident Inspector (LaSalle)
C. Miller, Senior Resident Inspector (Quad Cities)
R. Westberg, Senior Resident Inspector (Zion)