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ARTHUR E. LUNDVALL, JR.  
VICE PRESIDENT  
SUPPLY

June 25, 1981

Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Mr. D. G. Eisenhut, Director  
Division of Licensing

Subject: Calvert Cliffs Nuclear Power Plant  
Units Nos. 1 & 2, Docket Nos. 50-317 and 50-318  
Control of Heavy Loads

Reference: NRC letters dated December 22, 1980 (forwarding  
NUREG 0612) and February 3, 1981 from Eisenhut  
to All Licensees of Operating Plants

Gentlemen:

This is to review the status of our study of measures taken to control the movement of heavy loads at Calvert Cliffs and our progress toward implementation of the Interim Measures as requested in your December 22, 1980, letter. Also, it is the purpose of this letter to request an extension of the submittal dates for the reports requested by that letter.

#### Background

After a preliminary staff study of your directives and NUREG 0612, it was determined that the scope of work necessary to conduct an adequate heavy loads review would involve close coordination among several departments within our Company. A Working Group was established consisting of members from our engineering, operations, maintenance, and quality assurance organizations to conduct this review. We also initiated a contract with an architect-engineering firm as a consultant to assist us in this evaluation.

Following the receipt of your December 22, 1980, letter, a second letter, dated February 3, 1981, was received which forwarded several pages which had been missing from the former letter and extended one of the implementation dates to account for the omission. There was considerable confusion within our Company as to just which date(s) were extended. Subsequent telephone conversations between your staff and ours left us with the understanding that the submittal dates for the six month and nine month reports were also extended. This understanding was further clarified during an industry meeting on NUREG 0612 held at Florida Power & Light Company where members of your staff stated that the report dates had not been officially modified but that the NRC would entertain specific requests for extensions on a case-by-case basis.

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The following provides our request for such an extension and also addresses the status of implementation for the Interim Measures per your December 22, 1980, letter.

#### Request for Extension

Due to the misunderstanding of schedule described above and to the press of other high priority tasks, we will be unable to complete this work as required. Therefore, it is requested that an extension of submittal dates for the six month and nine month reports be granted as follows:

November 1, 1981 - Submittal of information identified in Section 2.1 of Enclosure 3 of December 22, 1980, letter.

March 1, 1982 - Submittal of information identified in Sections 2.2, 2.3, and 2.4 of above enclosure.

Also, an extension of the implementation date for the Interim Measures of your December 22, 1980, letter is requested. We are committing to the full implementation of all Interim Measures (discussed below) prior to our next re-fueling outage in April 1982.

#### Interim Measures Status

As described below, not all of the Interim Measures have been completed. We have assigned a priority to this task to ensure that all appropriate requirements are met before specific heavy loads are permitted to be lifted. Our basic approach to assessing heavy load lifting operations is to assure public health and safety by decreasing the probability that such a load could fall and the probability that radioactive releases could occur if the load did fall.

#### Interim Measure 1

Safe load paths should be defined per the guidelines of Section 5.1.1(1).

Status: Heavy loads have been identified for each overhead crane. Each of these heavy loads has been reviewed to determine if the load must pass over the reactor, the spent fuel pool, equipment associated with safe shutdown, or equipment required for heat removal generated from decay of spent fuel. Safe load paths have been defined for most of the critical heavy loads. Fuel handling operations are being examined to define the safe load paths, and work is continuing to complete this Interim Measure with the objective that safe load paths will be defined before a critical heavy lift is made.

#### Interim Measure 2

Procedures should be developed and implemented for the guidelines of Section 5.1.1(2).

Status: Many of the critical heavy loads were already covered by written procedures, and each of these procedures is being reviewed and revised as necessary. In addition, procedures are being developed for those critical heavy loads not having them. We will have a written procedure for each critical heavy load before such a lift is allowed.

Interim Measure 3

Crane operators should be trained, qualified, and conduct themselves per the guidelines of Section 5.1.1(3).

Status: The training program for crane operators is being reviewed to verify its adequacy and to incorporate any necessary modifications. Crane operators have been trained using a program developed by the National Inspection and Certification Bureau. Only operators so trained are permitted to operate cranes. These operators are designated by name on a shop/lab memo.

Interim Measure 4

Cranes should be inspected, tested, and maintained in accordance with the guidelines of Section 5.1.1(6).

Status: There is an inspection and maintenance program in existence. This program is being evaluated against the guidelines. Inspection and maintenance are being reviewed to ensure that proper documentation exists. Cranes will be reinspected where such reports are not available.

Interim Measure 5

Special attention to procedures, equipment and personnel for the handling of heavy loads over the core, such as vessel internals and vessel inspection tools.

Status: Review is underway to identify those specific loads that merit such special attention. Most of these loads are associated with a refueling operation.

If you have any questions on this matter, please call us. We will assume, in the interim, that our proposed dates are acceptable.

Very truly yours,

FMA:jch

cc: J. A. Biddison  
G. F. Trowbridge, Esquire  
Messrs. E. L. Conner, Jr. - NRC  
R. E. Architzel - NRC