Log # TXX-3420

File # 909.5

## TEXAS UTILITIES SERVICES INC.

2001 BRYAN TOWER - DALLAS, TEXAS 75201

A-36

October 8, 1981

Mr. Spottswood Burwell Licensing Project Manager U. S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION

CONTROL OF HEAVY LOADS: NUREG-0612

Dear Mr. Burwell:

Please find attached the resporse to Enclosure 2 of NRC letter dated December 22, 1980.

If you have any questions, please call.

Sincerely,

H. C. Schmidt

HCS: AND: kp

Attachment

c - Messrs. R. D. Calder

J. T. Merritt

J. C. Kuykendall

R. A. Jones

R. E. Ballard

A. T. Parker

BOS. 1

## COMANCHE PEAK STEAM ELECTRIC STATION CONTROL OF HEAVY LOADS: NUREG-0612

## RESPONSE TO ENCLOSURE 2 OF NRC LETTER DATED DECEMBER 22, 1980

REFERENCE (1) TEXAS UTILITIES SERVICES INC. LETTER, TXX-3384 DATED AUGUST 7, 1981.

Interim Action (1) S

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

Response (1)

Safe load areas and safe load paths will be developed for those load handling systems which traverse over safe shutdown equipment, decay heat removal equipment, or spent fuel. CPSES' commitment to this item is discussed in detail in our Response to Enclosure 3, (see reference 1) Comments 3(a) and 3(b) submitted to the NRC.

Interim Action (2)

Procedures should be developed and implemented per the guidelines of Section 5.1.1/2).

Response (2)

Procedures will be developed and implemented to minimize the risk of heavy load drops over safe shutdown or decay heat removal equipment or spent fuel. The development of these procedures is discussed in detail in our Response to Enclosure 3, Comments 3(b).

Interim Action (3)

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

Response (3)

Operators will be trained, qualified, and conduct themselves in accordance with Chapter 2-3 of ANSI B30.2-1976. (Reference Response to Enclosure 3, Comment 3(g).

Interim Action (4)

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

Respone (4)

Cranes which traverse over safe shutdown or decay heat removal equipment or spent fuel will be inspected, tested and maintained in accordance with Chapter 2-2 of ANSI B30.2-1976 and NUREG-0612, Section 5.1.1(6). (Reference CPSES Response to Enclosure 3, Comment 3(e).

Interim Action (5)

In addition to the above, special attention should be given to procedures, equipment, and personnel for the handling of heavy loads over the core, such as vessel internals or vessel inspection tools. This special review should include the following for these loads: (1) review of procedures for installation of rigging or lifting devices and movement of the load to assure that sufficient detail is provided and that instructions are clear and concise; (2) visual inspections of load bearing components of cranes, slings, and special lifting devices to identify flaws or deficiencies that could lead to failure of the component; (3) appropriate repair and replacement of defective components; and (4) verify that the crane operators have been properly trained and are familiar with specific procedures used in handling these loads, e.g., hand signals, conduct of operations, and content of procedures.

Response (5)

The procedures described above will be reviewed to ensure sufficient detail and that they are clear and concise after those procedures are written. Visual inspections of components mentioned above will be performed to detect flaws or deficiencies that could lead to failure and that, if defects are found, appropriate repairs will be made. Also crane operators will be properly trained and familiarized with procedures as discussed in Interim Action (3) above.

The interim actions discussed above will be developed and implemented prior to fuel load of CPSES Unit 1. The actions discussed above will not be necessary until that time since no potential adverse affects to public health exist from a heavy load drop during the construction phase at CPSES.