

CLEVELAND ELECTRIC ILLUMINATING COMPANY

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Datwyn R. Davidson VICE PRESIDENT SYSTEM ENGINEERING AND CONSTRUCTION

November 8, 1982

Mr. A. Schwencer, Chief Licensing Branch No. 2 Division of Licensing U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> Perry Nuclear Power Plant Docket Nos. 50-440: 50-441 Revision of Response to Draft Technical Evaluation Report -Control of Heavy Loads (NUREG-0612)

Dear Mr. Schwencer:

Attached are revised response pages to the recommendations in the draft technical evaluation report, "Control of Heavy Loads," on Safeload Paths (Section 2.3.1) and Load Handling Procedures (Section 2.3.2). These revised responses are to replace the response pages on Safeload Paths and Load Handling Procedures previously submitted on September 15, 1982.

If you have any questions, please let me know.

Very truly yours,

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Dalwyn R. Davidson Vice President System Engineering and Construction

DRD:kh

Artachment

cc: Jay Silberg, Esq. John Stefano Max Gildner Nick Fioravante Fred Clemenson

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GUIDELINES

RECOMMENDATION

- a) Load paths should be clearly marked on the floor in the areas where the load is to be handled.
- b) Analyze and justify alternate load paths.
- c) Maintain analysis and criteria used for hazard elimination available for review.

RESPONSE

- a) The load path will be clearly marked on the floor or walked through by the lift supervisor in the area where the load is to be handled and appropriate procedures will be implemented. The load will be walked through by the lift supervisor only in an area where it is difficult to clearly mark the load path on the floor.
- b) No alternate load paths are presently defined in the Perry Equipment Removal scheme; however, it is currently under evaluation. The Plant Operations Review committee will designate individuals authorized to approve procedural variations, typically the maintenance or shift supervisors.
- c) The analysis and criteria used for hazard elimination will be maintained on file and available for review. Also the PNPP Equipment Removal scheme and Special Handling/Safe Load Path procedures will be maintained on file and available for review.

Revised: November 8, 1982

 Safeload Paths (Section 2.3.1)

GUIDELINE

2) Load Handling Procedure (Section 2.3.2)

RECOMMENDATION

Load handling procedures should be submitted for review. This should include further information on whether the cranes are employed to lift the loads onto or off the dollies, and on whether the cranes are employed as mechanical mules to move the loaded dollies.

RESPONSE

The load handling procedures are being written and will be open for review on site when they are complete. Attached is a draft copy of Control of Heavy Loads procedures, MAP-1301. Additional procedures on crane operating guidelines, and guidelines for rigging are provided for your information. Dollies will be used in the movement of heavy loads, but will not be pulled by cranes, i. e. cranes are not used as mechanical mules.

Revised: November 8, 1982