



## Duquesne Light

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July 17, 1984

United States Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Mr. George W. Knighton, Chief  
Licensing Branch 3  
Office of Nuclear Reactor Regulation

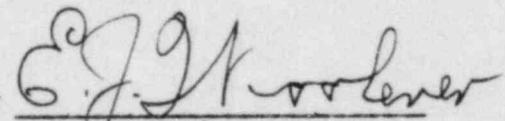
SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants"

Gentlemen:

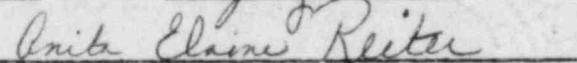
Your letter of 17 January 1984 transmitted the Technical Evaluation Report (TER) for the Phase I review of control of heavy loads at Beaver Valley Power Station, Unit 2 (BVPS-2). On June 15, 1984, this was the subject of a meeting between our staffs. This letter forwards the Duquesne Light Company responses to the issues identified in the TER.

DUQUESNE LIGHT COMPANY

By

  
E. J. Woolever  
Vice President

SUBSCRIBED AND SWORN TO BEFORE ME THIS  
16th DAY OF July, 1984.

  
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC  
ROBINSON TOWNSHIP, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES OCTOBER 20, 1986

KAT/nml  
Attachment

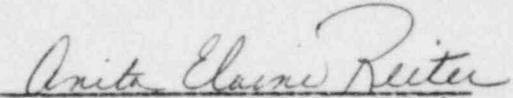
cc: Mr. H. R. Denton, Director (NRR) (w/a)  
Mr. D. Eisenhut, Director Division of Licensing (w/a)  
Mr. E. A. Licitra, Project Manager (w/a)  
Mr. T. Novak, Assistant Director Division of Licensing (w/a)  
Mr. G. Walton, NRC Resident Inspector (w/a)

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COMMONWEALTH OF PENNSYLVANIA )  
  ) SS:  
COUNTY OF ALLEGHENY          )

On this 16th day of July, 1984, before me,  
a Notary Public in and for said Commonwealth and County, personally  
appeared E. J. Woolever, who being duly sworn, deposed and said that (1) he  
is Vice President of Duquesne Light, (2) he is duly authorized to execute  
and file the foregoing Submittal on behalf of said Company, and (3) the  
statements set forth in the Submittal are true and correct to the best of  
his knowledge.

  
\_\_\_\_\_  
Notary Public

ANITA ELAINE REITER, NOTARY PUBLIC  
ROBINSON TOWNSHIP, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES OCTOBER 20, 1986

Response to Issues  
Identified in BVPS-2 TER (Phase I)  
on Control of Heavy Loads (COHL)

The following issues were raised by the BVPS-2 COHL TER and are responded to as indicated below:

- I. In Section 2.3.1, Paragraph C, the TER states the following:
1. The applicant has not fully satisfied the intent of this guideline in that no comment has been offered regarding floor markings of the load paths.
  2. If floor markings are not practical, alternative ways of path marking should be developed. An alternative means of marking the load path during a load transfer might be the use of temporary ribbon barriers.
  3. The applicant should indicate his alternative to permanent floor marking of the load paths, if an alternative is necessary.

Response:

BVPS-2 will utilize a procedure similar to that used on BVPS-1 for control of heavy loads. This procedure will comply with Guideline 1 of Enclosure 2 to the 17 January 1984 letter from Mr. G. W. Knighton by permitting two options:

1. Prior to a lift, the appropriate load path is temporarily marked (rope, pylon, etc.)
2. A second member of the load handling crew (not crane operator) is responsible for assuring the safe load path is followed by directing the crane operator.

The two options will preclude the need for permanently marking the safe load paths.

- II. In Section 2.3.4, Paragraph C, the TER states the following:

EG&G concludes that the applicant has not adequately addressed this section. The devices have not been designed in accordance to the requirement of ANSI N14.6-1978, and there is not enough information to make a comparison of the AISC design specification to that of ANSI-N14.6-1978. The safety factors indicated will not meet those specified by N14.6-1978.

The applicant should review the design of the lifting devices to N14.6-1978 as indicated in Section 2.3.4B.

Response:

Duquesne Light Company has engaged Westinghouse to perform a point-by-point review of the special lifting devices to ANSI N14.6-1978. The applicable results of this review will be provided to the NRC when complete.

III. In Section 2.3.5, Paragraph G, the TER states the following:

EG&G concludes that BVPS-2 is not in compliance with the intent of NUREG 0612 Section 5.1.1(5). The applicant should address this guideline in a separate section. The section should include both the maximum static and dynamic load stress of each loading device compared to calculated and tested load strength. Also any load limitation, specific crane usage restrictions or any limiting factor should be properly assessed for each sling. Each sling should be properly identified.

Response:

BVPS-2 will derate slings similarly to the method used on BVPS-1. This will comply with Guideline 5 of Enclosure 2 to the 17 January 1984 letter from Mr. G. W. Knighton in the following manner: In order to account for dynamic loads, the derating factor will be determined by multiplying sling rating by 0.5% times the hoist speed (ft/min). If the derating factor is found to be small (<15% of the rating), then the original sling rating may be utilized.

IV. In Section 2.3.6, Paragraph B, the TER states the following:

EG&G also wishes to call to the applicant's attention that specific plant operations may require alteration from ANSI B30.2-1976; for example, periodic inspections may not always be possible as scheduled. Therefore, alternate proposals are necessary, and they must be approved prior to being put into effect. EG&G concludes that the applicant has satisfied the intent of this guideline.

Response:

Duquesne Light Company agrees that some alternative proposals to ANSI B30.2-1976 may be required due to plant specifics. Duquesne Light Company will notify the NRC of any alternatives so identified.