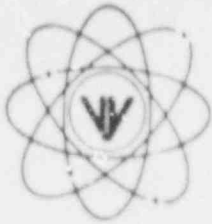


VERMONT YANKEE NUCLEAR POWER CORPORATION



RD 5, Box 169, Ferry Road, Crattleboro, VT 05301

FVY 88-36

REPLY TO:

ENGINEERING OFFICE

1671 WORCESTER ROAD

FRAMINGHAM, MASSACHUSETTS 01701

TELEPHONE 617-872-8100

May 10, 1988

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

- References:
- (a) License No. DPR-28 (Docket No. 50-271)
 - (b) Letter, VY/PC to USNRC, dated December 30, 1975
 - (c) Letter, VYNPC to USNRC, dated June 2, 1976
 - (d) Letter, USNRC to VYNPC, dated January 28, 1977,
"Amendment No. 29 to Facility Operating License No. DPR-28"
 - (e) Letter, USNRC to All Operating Licensees, Generic
Letter 80-07, dated December 22, 1980
 - (f) Letter, USNRC to All Operating Licensees, Generic
Letter 81-07, dated February 3, 1981
 - (g) Letter, VYNPC to USNRC, FVY 83-67, dated July 5, 1983
 - (h) Letter, USNRC to VYNPC, Nvy 83-180, dated July 28, 1983
 - (i) Letter, USNRC to VYNPC, Nvy 84-139, "Control of Heavy
Loads (Phase I)," dated June 27, 1984
 - (j) Letter, VYNPC to USNRC, FVY 85-45, dated May 17, 1985
 - (k) Letter, USNRC to All Licensees For Operating Reactors,
Nvy 85-138, Generic Letter 85-11, dated June 28, 1985
 - (l) Letter, USNRC to VYNPC, Nvy 85-132, dated July 1, 1985
 - (m) Letter, VYNPC to USNRC, FVY 85-68, dated July 30, 1985
 - (n) Letter, USNRC to VYNPC, Nvy 85-196, dated
September 16, 1985
 - (o) Letter, VYNPC to USNRC, FVY 86-118, dated December 30, 1986
 - (p) Letter, USNRC to VYNPC, Nvy 87-24, dated February 12, 1987

Subject: Request For Reconsideration of NRC Staff Condition For
Cask Lifting Device Review and Approval

Dear Sir:

The adequacy of the Vermont Yankee Reactor Building crane and its operation have been previously subjected to close scrutiny by Vermont Yankee and the NRC. By letters dated December 30, 1975 and June 2, 1976 [References (b) and (c)], Vermont Yankee provided detailed information concerning modifications which made the crane fully redundant and single failure proof for fuel cask movements. The NRC's review and approval of those modifications was documented in the January 28, 1977 Safety Evaluation Report and Amendment No. 29 to the facility license [Reference (d)] which modified

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the Vermont Yankee Technical Specifications to provide for specific surveillance and testing of the Reactor Building crane prior to fuel cask handling. The transmittal letter to that amendment also contained an added condition, specifically, "...so that there is no misunderstanding, prior to any cask movement you should submit for our review and approval an evaluation and description of the cask lifting devices exclusive of the above. The evaluation should provide assurance that the designed redundancy of the crane will be maintained and that there will be nil displacement of the load in the event of single failure."

In accordance with that requirement, Vermont Yankee has submitted for staff review and approval, all evaluations and descriptions of each new redundant cask lifting device prior to its use at Vermont Yankee. All of these requests received staff approvals [for example, References (h), (l), and (p)].

Subsequent to the issuance of License Amendment No. 29 [Reference (d)], the NRC published NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants" [References (e) and (f)]. This document established criteria which would assure the safe handling of heavy loads in nuclear power plants. NUREG-0612 also identified the guidance [ANSI N14.6-1978] to be used to insure compliance with regard to special lifting devices. This guidance identified the criteria for acceptable use of either single-load-path or dual-load-path special lifting devices to demonstrate this compliance.

By letter dated June 27, 1984 [Reference (i)], NRC concluded that the guidelines of NUREG-0612, Sections 5.1.1 and 5.3 were satisfied and that Phase I of that issue was closed for the Vermont Yankee Nuclear Power Station. NRC's closeout of Phase I of NUREG-0612 for Vermont Yankee [Reference (i)] addressed special lifting devices (i.e., the dryer and separator sling assembly and the head strong back). However, it did not address the condition imposed by the January 28, 1977 License Amendment transmittal letter to provide the details of each lifting device design to NRC for approval prior to any cask handling operations.

By Generic letter 85-11 [Reference (k)], NRC notified all licensees for operating reactors that Phase II of NUREG-0612 was considered completed for their facilities. Subsequently, Vermont Yankee requested and received approval [References (m) and (n), respectively] of a nonredundant type of cask lifting device on the basis that the redundancy requirement was met by the NUREG-0612 criteria for enhanced factors of safety associated with the device.

On the basis that NUREG-0612 is now complete for Vermont Yankee and that all evaluations and descriptions of each new cask lifting device previously submitted for staff review prior to its use at Vermont Yankee have been approved by NRC; we request that the subject NRC staff condition be rescinded. Vermont Yankee will establish and maintain administrative controls to

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evaluate each new cask lifting device proposed for application at Vermont Yankee to ensure that the applicable requirements to our operating license and the NUREG-0612 criteria associated with the device are met, such that the load cannot be dropped in the event of a credible single failure in the lifting system. Thus, Vermont Yankee will continue to evaluate each new cask lifting device being used to assure compliance with these requirements. These evaluations will be available for NRC staff review.

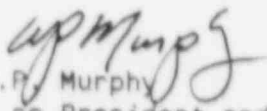
As discussed above, the requirement for Vermont Yankee to submit for NRC review and approval an evaluation and description of each new cask lifting device prior to any cask movement was intended as an interim action, established prior to the issuance of NUREG-0612, and was never incorporated directly within the Vermont Yankee Technical Specifications. The January 28, 1977 staff condition is no longer necessary because: 1) the requirements established by NUREG-0612 for assuring the safe handling of heavy loads and all other special lifting devices in nuclear power plants have been closed out for Vermont Yankee; 2) all evaluations and descriptions of each new cask lifting device submitted during the past ten years for staff review in accordance with the staff condition have been approved by NRC; 3) Vermont Yankee will establish and maintain procedural controls to evaluate each new cask lifting device proposed for application at Vermont Yankee to ensure the requirements of our operating license and NUREG-0612 criteria [(5.1.6 (1) and (3))] are met; and 4) these evaluations will be available for NRC staff review at the plant site. Hence, it is Vermont Yankee's position that the subject condition established in your letter of January 28, 1977 is no longer necessary and, accordingly, request that it be rescinded.

In accordance with the provisions of 10CFR170.12, an application fee of \$150.00 is enclosed.

We trust that the information provided above is sufficient for your review and approval of our request; however, should you require additional information, please contact us.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


W.P. Murphy
Vice President and
Manager of Operations

WPM/ss

cc: V.L. Rooney
Regional Administrator, Region I
Resident Inspector, VYNPC