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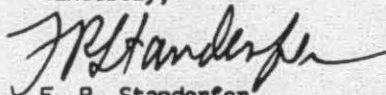
TMI Program Office
Attn: Dr. B. J. Snyder
Program Director
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Snyder:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Heavy Load Travel Inside Containment

In response to a request for additional information, as forwarded by NRC letter, Dr. B. J. Snyder to Mr. F. R. Standerfer, dated December 18, 1984, attached are the GPU Nuclear responses to specific NRC questions concerning expansion of the TMI-2 Reactor Building heavy load travel boundaries. These responses provide information to clarify and expand information presented in the original GPU Nuclear submittal (4410-84-L-0193) dated November 1, 1984, and to resolve comments provided on December 18, 1984.

Sincerely,



F. R. Standerfer
Vice President/Director, TMI-2

FRS/RBS/jep

Attachment

cc: Deputy Program Director - TMI Program Office, Dr. W. D. Travers

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HEAVY LOAD HANDLING INSIDE CONTAINMENT
SAFETY EVALUATION REPORT

Response to NRC Comments

COMMENT NO. 1

Section 2.0 describes activities that should precede all load handling activities. It is the staff's opinion that these activities be requirements, not recommendations, prior to any load handling activities. This change would make this SER consistent with your Lifting and Handling Program (4000-PLN-3891.01).

GPU NUCLEAR RESPONSE

The activities identified in Section 2.0 will be required prior to the handling of heavy loads inside containment. The Unit Work Instructions (UMI's) or procedures specific to a load to be moved will define the load path, special precautions, and required man-power and, if the polar crane is utilized, will require the operation of the polar crane in accordance with procedure "TMI Unit 2 Recovery Operations Polar Crane Operation (Limited Function Refurbished Polar Crane)", 4000-IMP-3891.01, which implements 4000-PLN-3891.01. The use of any other lifting equipment to move heavy loads will be in accordance with procedure(s) which will implement 4000-PLN-3891.01.

COMMENT NO. 1

Secondly, you should explain to the staff how the new exclusion area boundaries will be controlled to ensure that the polar crane operator does not inadvertently travel into a restricted zone.

GPU NUCLEAR RESPONSE

The handling of heavy loads inside containment is performed via approved UMI's or procedures which designate safe load path areas included within the acceptable areas defined in this SER. By Procedure 4000-IMP-3891.01, the polar crane operator will respond only to signals from the person appointed as signalman for normal crane movements. It is the responsibility of the appointed signalman to ensure that load movement is restricted to those areas specifically designated by the approved UMI or procedure.

COMMENT NO. 3

Thirdly, you should also include in Section 1.3 as a heavy load exclusion area during defueling operations, the deep end of the fuel transfer canal, and any other area in containment where fuel container canisters are transferred and stored.

GPU NUCLEAR RESPONSE

Section 1.3 states that the deep end of the fuel transfer canal is included as an exclusion area when fuel-filled canisters are present. Section 3.5.2.1 also states that this SER specifically excludes from its scope the handling of heavy loads over areas containing spent fuel. Thus, the exclusion areas during defueling are intended to include any area in which a dropped load in that area could cause damage to a canister containing fuel.

COMMENT NO. 4

In addition, for Figures 3.3-1, 3.3-2, and 3.3-3, the exclusion area should be indicated by markings on the drawings. Presently, only a boundary is indicated. (There are no indications on the drawing, which may be used apart from the SER discussion, to indicate whether the exclusion area is within or outside of the indicated boundary.)

GPU NUCLEAR RESPONSE

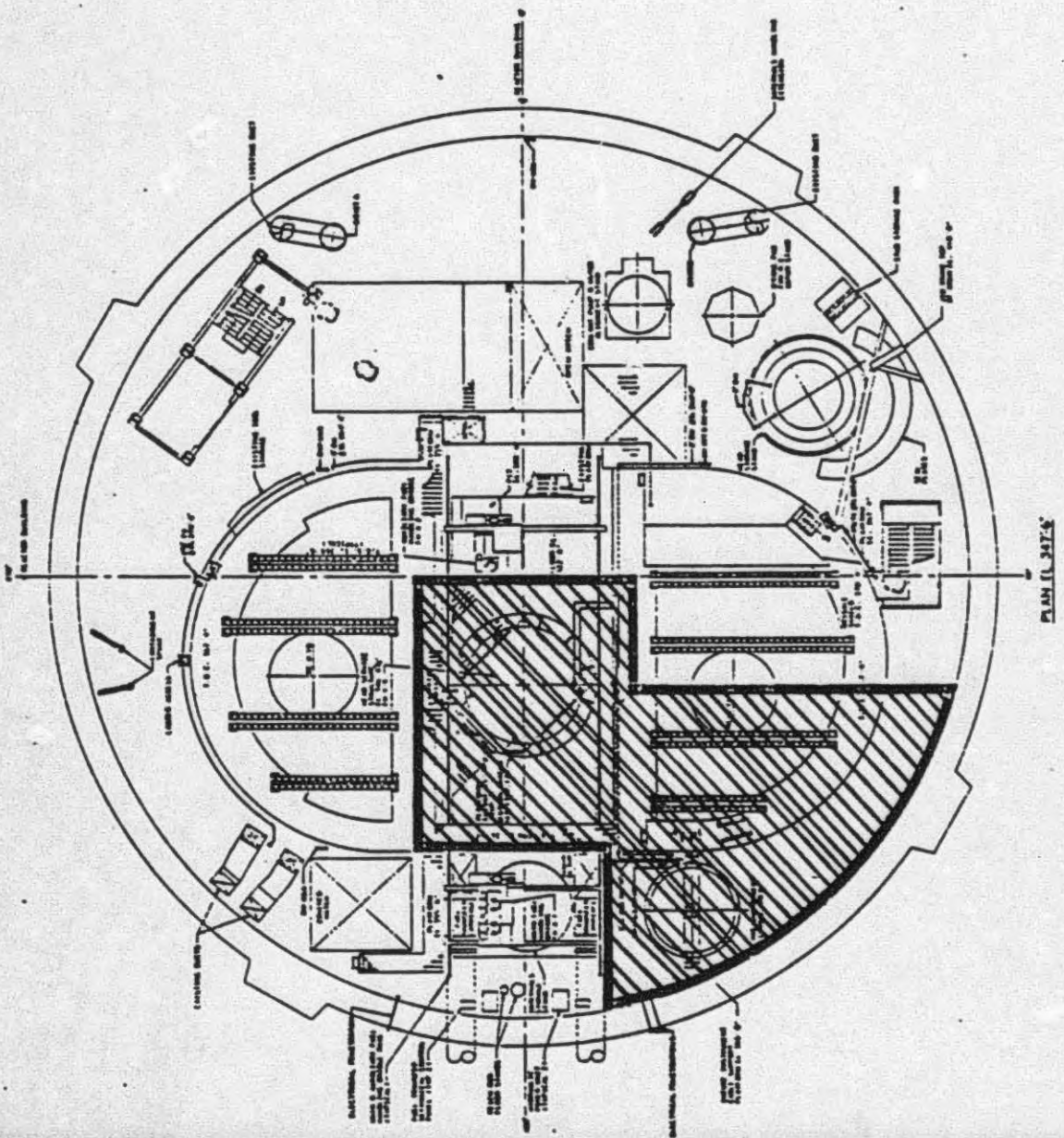
As stated in the response to Comment No. 2, the handling of heavy loads inside containment is performed via approved UWI or procedure which designates safe load path areas. It is the responsibility of the Responsible Technical Reviewer (RTR) to ensure that the UWI or procedure is in compliance with applicable SER's. The RTR's will be aware of the exclusion areas within the indicated boundaries (See Note 2: "The load path boundary encloses the exclusion areas".) To ensure that the exclusion areas are readily identifiable, those areas have been "cross-hatched" as shown on the attached figures.



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**FIGURE 3.3-1
POTENTIAL LOAD/IMPACT AREAS
WITH EQUIPMENT IDENTIFIED
PLAN ELEVATION 347.6**

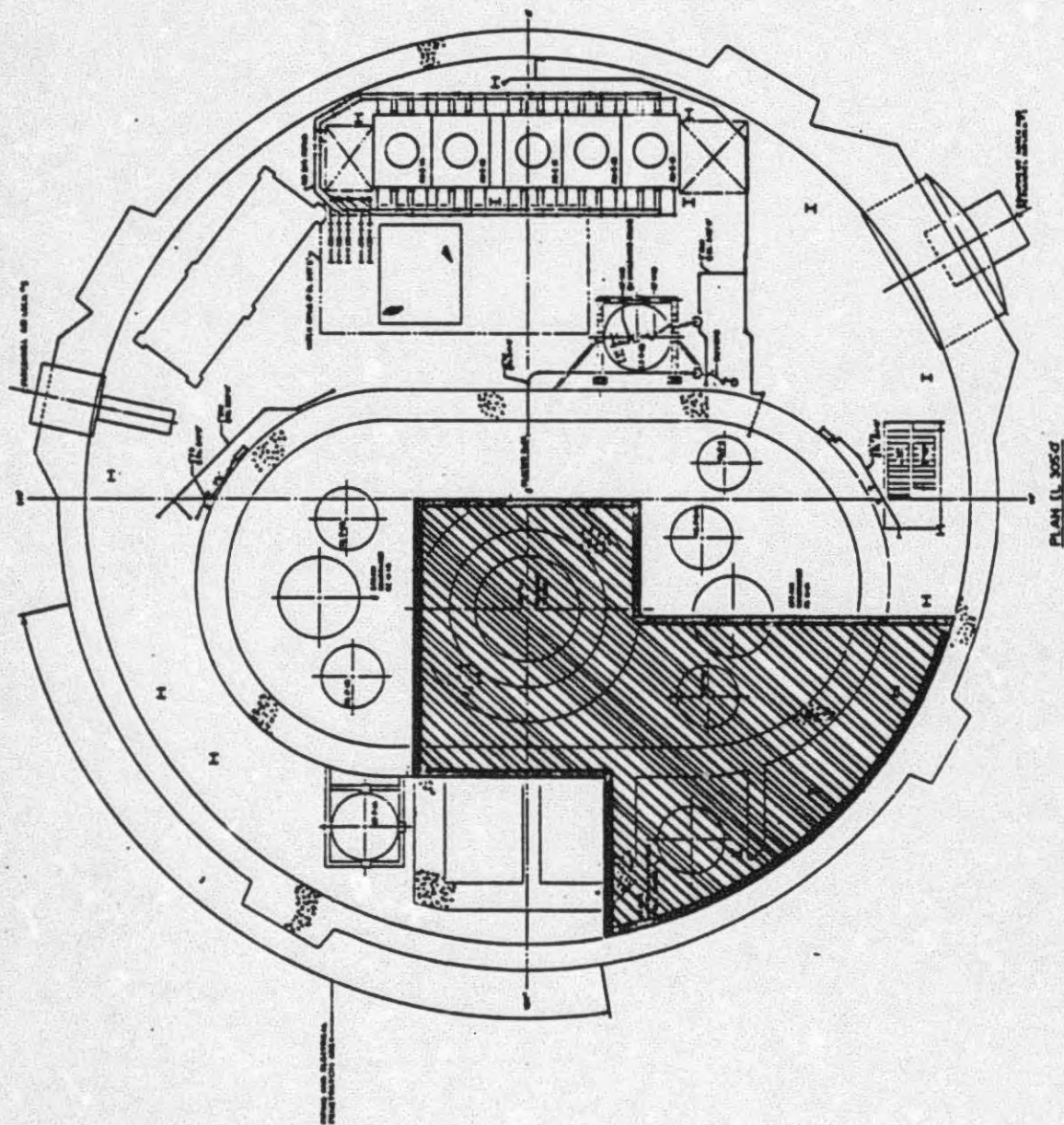




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FIGURE 3.3-2
POTENTIAL LOAD/IMPACT AREAS
WITH EQUIPMENT IDENTIFIED
PLAN ELEVATION 305.0'





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FIGURE 33-3
POTENTIAL LOAD/IMPACT AREAS
WITH EQUIPMENT IDENTIFIED
PLAN ELEVATION 282'-6"

