

May 18, 2004

Mr. Randall K. Edington
Vice President-Nuclear and CNO
Nebraska Public Power District
P. O. Box 98
Brownville, NE 68321

SUBJECT: COOPER NUCLEAR STATION - REQUEST FOR ADDITIONAL INFORMATION
REGARDING RELIEF REQUESTS RI-17 AND RI-31 (TAC NOS. MC2061 AND
MC2062)

Dear Mr. Edington:

By letter dated February 12, 2004, Nebraska Public Power District (the licensee) requested the Nuclear Regulatory Commission (NRC) staff grant relief from certain inservice inspection requirements, including RI-17 and RI-31. RI-17 requests approval to eliminate disassembling the pipe clamp or restraint to examine welded attachments and examining them to the maximum extent possible in accordance with applicable Code requirements. RI-31 requests that the austenitic welds that are not accessible for inspection from both sides will be inspected from the one side that is accessible.

The NRC staff has reviewed the information provided in the February 12, 2004, submittal and determined that additional information is required in order to complete the review of RI-17 and RI-31. As agreed upon in a telephone call on May 17, 2004, the licensee will respond to each request for additional information (RAI) within 45 days. The RAIs are enclosed.

Sincerely,

/RA/

Michelle C. Honcharik, Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosures: 1. RAI for RI-17
2. RAI for RI-31

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

ISSUES RELATED TO RELIEF REQUEST RI-17

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NO. 50-298

1. RI-17 states in the "Component Identification" that the applicable Code Classes are 1 and 2, while the rest of the request pertains to Code Classes 1, 2, and 3. What are the Code Classes for this request?
2. RI-17 identifies the Code Requirement as Code Case N-509. The NRC staff endorsed this code case in Regulatory Guide (RG) 1.147, Revision 12, "Inservice Inspection Code Acceptability—ASME Section XI, Division 1," with the condition that: "A minimum 10% sample of integrally welded attachments for each item in each Code class per interval should be examined." Code Case N-509 was later annulled in Code Case Supplement 1 to the 2001 Edition. The NRC does not give relief from code cases. Request for relief from the code requirements must identify the particular requirements. Please identify what specific articles, paragraphs, tables, and/or figures of the 1989 Edition, No Addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI that will apply to this request.
3. RI-17 states in the "Basis for Relief" that the 1995 Edition, 1995 Addenda, Figures IWB-2500-15, IWC-2500-5 and IWD-2500-1 for welded attachments were modified to add the following note: "Examination of surface areas may be limited to the portions of these areas that are accessible without removal of support members." Table IWB-2500-1, Examination Category B-K; Table IWC-2500-1, Examination Category C-C; and Table IWD-2500-1, Examination Category D-A identify the extent of the examination in Footnote (2) as being, "The extent of the examination includes essentially 100% of the length of the attachment weld at each attachment subject to examination." For the welded attachments affected by this request, please explain the application of Footnote (2) to Tables IWB-2500-1, IWC-2500-1, and IWD-2500-1 and the application of the note included in Figures IWB-2500-15, IWC-2500-5 and IWD-2500-1.
4. RI-17 states in the "Proposed Alternative Positions" that the request is applicable for the examination and acceptance of Class 1, Class 2, and Class 3 welded attachments. Please identify the specific articles, paragraphs, tables, and/or figures in the 1995 Edition, 1996 Addenda of ASME Code Section XI that will apply to this request.
5. The request for relief is for the third 10-year ISI interval. On what date did the third 10-year interval start?

ENCLOSURE 1

REQUEST FOR ADDITIONAL INFORMATION

ISSUES RELATED TO RELIEF REQUEST RI-31

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NO. 50-298

1. Table RI-31-1 of RI-31 identified 30 welds with an estimated ultrasonic testing examination coverage of only 50 percent, which is less than the essentially 100 percent coverage required by the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. Please provide cross-section drawings of the different configurations (one drawing may represent a group of similar configurations) that show the obstructions and limitations, describe the limitations to axial and circumferential scans, and show the transducer center ray path through the inspection volume. Identify the pipe and weld materials (ferritic, stainless steel, or Inconel).
2. Table RI-31-1 of RI-31 provides a listing of the estimated coverage (volume) achieved in the second 10-year interval for each weld. For the third interval, please provide in the table the expected coverage (volume) examined with ASME Code Section XI, Appendix VIII qualified procedures and personnel and the coverage (volume) examined using a best effort (may be the same Appendix VIII procedures and personnel used in an unqualified application). Also, please provide an explanation for the differences in examination coverage (volume) when the second interval exceeds the sum of the third interval. The third interval is the total of the Appendix VIII coverage plus "best effort" coverage.
3. The first and third paragraphs of the "Basis for Relief" section of RI-31 refer to 10 CFR 50.55a(b)(2)(xvi)(A). However, the regulatory requirements mentioned in the two paragraphs are contained in 10 CFR 50.55a(b)(2)(xv)(A) and 10 CFR 50.55a(b)(2)(xvi)(B), respectively. What regulations are being referred to in this section?

ENCLOSURE 2

Cooper Nuclear Station

cc:

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December 2003