



**Nebraska Public Power District**  
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10CFR50.55(a)

NLS2004068  
May 18, 2004

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

**Subject:** Response to Request for Additional Information Regarding Relief Request RC-06  
Cooper Nuclear Station, Docket 50-298, DPR-46

- References:**
1. Letter to U.S. Nuclear Regulatory Commission from Randall K. Edington (Nebraska Public Power District) dated February 12, 2004, "Inservice Inspection Relief Requests PR-03, RC-06, RC-07, RI-17, RI-31, RI-32 and RI-33" (NLS2004009)
  2. Letter to Randall K. Edington (NPPD) from U. S. Nuclear Regulatory Commission dated April 23, 2004, "Cooper Nuclear Station - Request for Additional Information Regarding Relief Request RC-06 (TAC NO. MC2059)"

The purpose of this letter is for the Nebraska Public Power District (NPPD) to submit a response to a Request for Additional Information (RAI) regarding Inservice Inspection (ISI) Relief Request RC-06 (Reference 2).

In Reference 1 above, NPPD requested that the Nuclear Regulatory Commission (NRC) grant relief from certain ISI code requirements for Cooper Nuclear Station (CNS) pursuant to 10CFR50.55(a). During a teleconference between NPPD and the NRC staff on April 5, 2004, NRC concerns with Relief Request RC-06 and the potential to request relief in accordance with ASME Code Case N-649 were discussed. It was concluded that the NRC would provide these questions in a RAI.

The Attachment to this letter provides NPPD's response to the RAI.

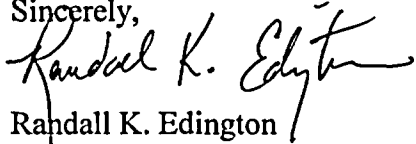
If you should have any questions concerning this matter, please contact Paul V. Fleming at (402) 825-2774.

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Sincerely,

A handwritten signature in black ink, appearing to read "Randall K. Edington". The signature is fluid and cursive, with the first name "Randall" being more prominent.

Randall K. Edington  
Vice President - Nuclear and  
Chief Nuclear Officer

/rar

Attachment

cc: Regional Administrator w/ attachment  
USNRC - Region IV

Senior Project Manager w/ attachment  
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector w/ attachment  
USNRC

NPG Distribution w/o attachment

Records w/ attachment

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING  
RELIEF REQUEST RC-06

Cooper Nuclear Station, Docket 50-298, DPR-46

1. NRC Request

*The licensee requests relief from Subsubarticle IWE-5240 or the 1992 Edition and the 1992 Addenda of Section XI of the American Society of Mechanical Engineers Code. IWE-5240 (by reference to the requirements of Subsubarticle IWA-5240) requires the licensee to perform a VT-2 visual examination during a pressure test to detect evidence of leakage. The licensee requests relief from performing a VT-2 visual examination during pressure testing the containment pressure retaining components. Alternatively, the licensee will perform VT-1 or VT-3 visual examination, as appropriate. To get a clear understanding of how the licensee will determine the appropriateness of VT-1 and VT-3 visual examination, the licensee is requested to provide the following information:*

- (a) *The intent of IWE-5240 is to detect the areas of leakage during pressure testing of the containment pressure boundary components. How would you perform the examination of a leaking component which is in part inaccessible and detect leakage area (s) (e.g., Type B testing of vent pipes between the drywell and the suppression chamber)?*

NPPD Response

Article IWE-5000 is only applicable to repairs and replacement and within the limitation stated in IWE-5000.

If an area that is normally inaccessible requires a repair or replacement, the area would be made accessible to perform the repair or replacement (e.g., removal of the guard pipe or the concrete). The required examination, whether it is a VT-2, VT-3 or VT-1, would be performed prior to the full restoration of the configuration (i.e., reinstallation of the guard pipe or concrete).

NRC Request

- (b) *In some cases, IWE-5222 permits deferral of pressure test following minor repair. How would you perform the examination of the repaired areas to ensure that the repaired areas will not be leaking during the deferral period?*

NPPD Response

NPPD is not requesting relief from the provisions of IWE-5222. IWE-5222 allows deferral of the leakage test for minor repairs or modifications to the pressure retaining

boundary, provided nondestructive testing is performed in accordance with the approved repair program. The nondestructive testing in accordance with an approved repair program will provide reasonable assurance that the repaired area is not leaking until the next scheduled leak test is performed.

## ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

**Correspondence Number: NLS2004068**

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the Licensing & Regulatory Affairs Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

[illegible]