



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

NLS2004063  
May 18, 2004

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

**Subject:** Resubmittal of Inservice Inspection Relief Request PR-03  
Cooper Nuclear Station, Docket 50-298, DPR-46

**Reference:** 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)

The purpose of this letter is for the Nebraska Public Power District (NPPD) to resubmit Inservice Inspection (ISI) Relief Request PR-03, Revision 2.

In the letter referenced above, NPPD requested 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 March 25, 2004, NRC concerns with Relief Request PR-03, Revision 2, as written, were discussed.

The Attachment to this letter contains NPPD's changes to ISI Relief Request PR-03, Revision 2, to address the NRC staff concerns.

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

Sincerely,

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

/rar

Attachment

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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

**RELIEF REQUEST NUMBER: PR-03, REVISION 2**

**COMPONENT IDENTIFICATION**

Code Classes: 1, 2, and 3  
References: IWA-5250  
Examination Categories: B-P, C-H, and D-A  
Item Numbers: B15.10 through B15.71, C7.10 through C7.80, and D1.10  
Description: Alternate corrective measures for bolted connections.  
Component Numbers: All Class 1, 2, and Class 3 pressure retaining components subject to system pressure testing.

**APPLICABLE CODE EDITION AND ADDENDA**

1989 Edition, No Addenda

**CODE REQUIREMENT**

IWA-5250(a)(2) requires, if leakage occurs at a bolted connection, that the bolting be removed, examined by VT-3 visual examination for corrosion, and evaluated in accordance with IWA-3100.

**BASIS FOR RELIEF**

In the event of a bolted connection leak detected during the conduct of a system pressure test, the 1989 Edition, ASME Section XI requirements specify that all bolting must be removed for the purpose of a VT-3 visual examination and evaluation. This requires removing the component or piping system from service, which could result in a plant shutdown, a delay of plant startup or, for continued operation, a reduction in plant safety.

Nebraska Public Power District's (NPPD) proposed alternative to requirements of the 1989 Edition of the Code was approved by the Nuclear Regulatory Commission (NRC). Specifically, NPPD would evaluate the bolting to determine its susceptibility to corrosion, perform a more in-depth evaluation as applicable and if necessary, remove the bolt closest to the source of leakage and evaluate the bolt in accordance with IWA-3100(a).

Since the granting of the above relief, the Section XI Code requirements have changed making clear the purpose of the examination is to detect degradation of bolting due to leakage from borated systems. The ASME Code Section XI, 1998 Edition, 1999 Addenda, revised Subsubarticle IWA-5250 (a)(2) as follows:

*"If leakage occurs at a bolted connection in a system borated for the purpose of controlling reactivity, one of the bolts shall be removed, VT-3 examined, and evaluated in accordance with IWA-3100. The bolt selected shall be one closest to the source of leakage. When the removed*

**RELIEF REQUEST NUMBER: PR-03, REVISION 2 (Continued)**

*bolt has evidence of degradation, all remaining bolts in the connection shall be removed, VT-3 examined, and evaluated in accordance with IWA-3100."*

Under the revised subsubarticle, the examination is applicable to code piping of borated water systems. Cooper Nuclear Station (CNS) is a boiling water reactor and does not use borated water to control reactivity during normal plant operation.

No other changes made in the 1999 Addenda are related to the change made in Subsubarticle IWA-5250. System pressure testing requirements contained in Examination Tables IWB-2500-1, IWC-2500-1 and IWD-2500-1 were not affected. Repair and replacement activities must still be performed in accordance with the repair and replacement program, as applicable.

NPPD requests approval to use the corrective action requirements of ASME Section XI, 1998 Edition, 1999 Addenda, Subsubarticle IWA-5250 in accordance with 10CFR50.55a(g)(4)(iv).

**PROPOSED ALTERNATE PROVISIONS**

In lieu of the requirements contained in Subsubarticle IWA-5250 of the 1989 Edition of Section XI, NPPD will comply with the corrective action requirements for bolted connections contained in Subsubarticle IWA-5250 of the 1998 Edition, 1999 Addenda of Section XI.

**APPLICABLE TIME PERIOD**

Approval is requested for the third ten-year interval of the ISI Program for CNS, which ends on February 28, 2006.

PR-03, Revision 1 was approved by the NRC on October 23, 1997 (TAC No. M94000).

