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10 CFR 50.55a

NLS2006064
August 1, 2006

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

Subject: Response to U.S. Nuclear Regulatory Commission Request for Additional Information Regarding Relief Request RI-13 for the Fourth 10-Year Inservice Inspection Interval Cooper Nuclear Station, Docket No. 50-298, DPR-46

References:
1. Letter from Brian Benney, U.S. Nuclear Regulatory Commission, to Randall K. Edington, Nebraska Public Power District, dated July 7, 2006, "Cooper Nuclear Station – Request for Additional Information Re: Relief Request RI-13 for the Fourth 10-Year Inservice Inspection Interval" (TAC NO. MD0281)

2. Letter from Randall K. Edington, Nebraska Public Power District, to U.S. Nuclear Regulatory Commission, dated February 23, 2006, "10 CFR 50.55a Requests for Fourth Ten-Year Inservice Inspection Interval" (NLS2006015)

The purpose of this letter is to submit the Nebraska Public Power District (NPPD) response to the Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI)(Reference 1) regarding the Fourth Ten-Year Inservice Inspection Interval Program Relief Request RI-13 (Reference 2). Attachment to this letter lists the individual questions posed in the NRC RAI and NPPD responses to those questions.

Should you have any questions concerning this matter, please contact Paul Fleming, Licensing Manager, at 402-825-2774.

Sincerely,

JB Hindahan for RK Edington

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

/wm

Attachment

COOPER NUCLEAR STATION
P.O. Box 98 / Brownville, NE 68321-0098
***Telephone:** (402) 825-3811 / **Fax:** (402) 825-5211*
www.nppd.com

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cc: Regional Administrator w/attachment
USNRC - Region IV

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

Senior Resident Inspector w/attachment
USNRC - CNS

NPG Distribution w/o attachment

CNS Records w/attachment

Attachment

Response to NRC Request for Additional Information Regarding Fourth Ten-Year Interval Pump and Valve Inservice Testing Program Relief Request RI-13

Nebraska Public Power District
Cooper Nuclear Station, Docket No. 50-298, DPR-46

1. NRC Request

In Relief Request RI-13, under "Proposed Alternative and Basis for Use" the licensee states that the "CNS Snubber Program will be used in lieu of IWF-5200 and IWF-5300 requirements." The licensee then states, "the examination of snubber integral attachments will be performed in accordance with IWB/IWC/IWD-2500." IWF-5200 and IWF-5300 contain IWF-5200(a), (b), and (c), and IWF-5300(a), (b), and (c). IWF-5200(c) and IWF-5300(c) clearly state that integral and non-integral attachments for snubbers, including lugs, bolting, pins, and clamps, shall be examined in accordance with the requirements of Subsection IWF. Also, the American Society of Mechanical Engineers (ASME), Section XI, IWF-1000 states, "[t]his subsection provides the requirements for inservice inspection of Class 1, 2, and 3 and MC component supports." Please clarify how the requirements of IWF-5200(c) will be met by using IWB/IWC/IWD-2500. (Note: Subsections IWB, IWC, and IWD are not related to Class 1, 2, and 3 component supports.)

NPPD Response

Integral attachments to Class 1, 2, and 3 piping and components must be inspected in accordance with IWB/IWC/IWD-2500 (surface exams for IWB & IWC and VT-1 for IWD). If the integral attachment is part of a piping or component support, IWB/IWC/IWD-2500 still applies and will satisfy IWF-5200(c). Non-integral attachments for snubbers, including lugs, bolting, pins, and clamps are visually examined with qualified VT-3 examiners. The inspections performed in accordance with IWB/IWC/IWD-2500 (for integral attachments) and in accordance with the Cooper Nuclear Station (CNS) Technical Requirements Manual (TRM) to non-integral attachments for snubbers, including lugs, bolting, pins, and clamps meets the requirements of IWF-5200(c).

2. NRC Request

The CNS Snubber Program provided in the relief request under "Proposed Alternative and Basis for Use" has much more detail than the snubber program described in the CNS Technical Requirement Manual (TRM), Revision 1. Please explain why the TRM does not contain the same level of detail as the Relief Request. Are any other CNS procedures required to be used with CNS TRM T 3.7.3?

NPPD Response

The TRM is the governing document and does not contain detail about how the requirements are implemented. Yes, other CNS procedures are required to implement the requirements of CNS TRM TLCO 3.7.3. The current procedures used to implement the program are:

Procedure 0-CNS-12, CNS TECHNICAL PROGRAM ADMINISTRATION describes how programs are implemented at CNS.

Engineering Procedure 3.39, SNUBBER PROGRAM, describes details of how the snubber program is administered.

Surveillance Procedure 6.SNUB.601, SNUBBER OPERABILITY, implements the surveillances described in the CNS TRM TLCO 3.7.3.

Surveillance Procedure 6.SNUB.602, SNUBBER SERVICE LIFE MONITORING, implements the service life requirements of the CNS TRM TLCO 3.7.3.

Maintenance Procedure, 7.2.34.1, SNUBBER EXAMINATION, provides details and acceptance criteria for visual inspection of snubbers.

Maintenance Procedure, 7.2.34.2, PIPE SNUBBERS REMOVAL AND INSTALLATION, provides details required for removal and installation of snubbers including as-found and as-left visual examination.

Maintenance Procedure, 7.2.34.3, GRINNELL FIGURE 200/201 HYDRAULIC SNUBBER MAINTENANCE, details refurbishment of CNS hydraulic snubbers.

Maintenance Procedure, 7.2.34.4, PACIFIC SCIENTIFIC PSA-3 AND PSA-10 SNUBBER MAINTENANCE, details refurbishment of two sizes of PSA snubbers.

Maintenance Procedure, 7.2.34.5 PACIFIC SCIENTIFIC PSA-35 SNUBBER MAINTENANCE, details refurbishment of PSA-35 snubbers.

Maintenance Procedure, 7.2.34.7, GRINNELL FIGURE 200/201 HYDRAULIC SNUBBER FUNCTIONAL TEST, details testing and provides acceptance criteria.

Maintenance Procedure, 7.2.34.8, PACIFIC SCIENTIFIC SNUBBER FUNCTIONAL TEST, details testing and provides acceptance criteria.

Maintenance Procedure, 7.2.34.10, MECHANICAL AND HYDRAULIC SNUBBER PRE-OPERATIONAL CALIBRATION TEST, details test bench preparation prior to testing.

3. NRC Request

ASME/American National Standards Institute (ANSI) Operation and Maintenance (OM)-1987, Part 4 with OMa-1988, Sections 1.5.6," Snubber Maintenance or Repair," and 1.5.7, "Snubber Modification and Replacement," specifies requirements for snubber repair and replacement. IWF-5000 also contains Section IWF-5400, "Repair/Replacement Activities." In the submitted relief request, the licensee is silent regarding IWF-5400. IWF-5400 states, "Repair/replacement activities performed on snubbers shall be in accordance with IWA-4000. Snubbers installed, corrected or modified by repair/replacement activities shall be examined and tested in accordance with the applicable requirements of IWF-5200 prior to return to service." Please clarify how these requirements will be met.

NPPD Response

No relief from IWF-5400 has been requested. Repair/replacement activities performed on snubbers will be in accordance with IWA-4000. Preservice examinations and tests are accomplished with the Maintenance Procedures identified in the response to question 2 above.

4. NRC Request

IWF-5200(a) and IWF-5300(a) states that "preservice and inservice examination shall be performed in accordance with ASME/ANSI OM Part 4." Please provide a line-by-line comparison between the various sections of CNS TRM T 3.7.3 and OM Part 4 (e.g., Sections 2.1, 2.4, 3.2, and 3.3) and explain how CNS TRM T 3.7.3 provides an acceptable level of quality and safety comparable to that provided by OM Part 4.

NPPD Response

CNS TRM TLCO 3.7.3 was developed from the Custom Technical Specification (CTS) requirements that were removed from the CTS as part of implementation of the Improved Technical Specifications (ITS). CNS TRM TLCO 3.7.3 and the procedures identified in Response 2 above provide an acceptable level of quality and safety that is comparable to that provided by OM Part 4. Specifically, Sections 2.1 and 2.4 are addressed by procedure 7.2.34.2 and Sections 3.2 and 3.3 are addressed by procedures 7.2.34.7 or 7.2.34.8 depending on snubber type. The snubber examination frequency is performed in accordance with CNS TRM TLCO 3.7.3. This inspection frequency was previously part of the TS and provides an acceptable level of quality and safety in accordance with Generic Letter 90-09.

5. NRC Request

The submitted relief request and the CNS TRM do not address the requirements of OM Part 4, Section 2.3.4, "Inservice Examination Failure Evaluation." Please explain how the TRM meets this requirement.

NPPD Response

CNS TRM TLCO 3.7.3 does require examination failure evaluation. Required Action A.1 accomplishes the same requirements as OM Part 4, Paragraph 2.3.4.1. Required Action A.2 accomplishes the same requirements as OM Part 4, Paragraph 2.3.4.2. CNS TRM TLCO 3.7.3 does not formally address Failure Mode Grouping. However, for any examination failures, an engineering evaluation is performed in accordance with Required Action A.3.

6. NRC Request

The submitted relief request and the CNS TRM do not address the requirements of OM Part 4, Section 3.2.4, specifically Section 3.2.4.2, "Test Failure Mode Groups." Please explain how the CNS TRM meets this requirement.

NPPD Response

As stated in response to question 5 above, CNS TRM TLCO 3.7.3 does not specifically address Failure Mode Groups. However TSR 3.7.3.3 and TSR 3.7.3.4 accomplish a similar intent as Failure Mode Grouping.

7. NRC Request

The submitted relief request and the CNS TRM do not address the requirements of OM Part 4, Sections 1.5.6, "Snubber Maintenance or Repair," and Section 1.5.7, "Snubber Modification and Replacement." Please explain how the CNS TRM meets this requirement.

NPPD Response

As stated earlier in the response to question 3, repairs and replacements will be in accordance with IWA-4000. The maintenance procedures identified in the response to question 2 above are the current procedures used to maintain and/or repair snubbers. Modified snubbers would be evaluated with the CNS configuration control process prior to installation. Any modified snubbers will require functional testing in accordance with the procedures identified in response 2 above (or new similar procedures, if appropriate) prior to installation. Modified snubbers also require a preservice examination in accordance with Maintenance Procedure 7.2.34.2 prior to being put in service.

Correspondence Number: NLS2006064

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 Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITMENT NUMBER	COMMITTED DATE OR OUTAGE
None		