

April 22, 2008

MEMORANDUM TO: FILE

FROM: Carl F. Lyon, Project Manager /RA/
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: COOPER NUCLEAR STATION - SUMMARY OF TELEPHONE
CONFERENCE RE: VERBAL AUTHORIZATION FOR RELIEF
REQUEST RI-35 (TAC NO. MD8025)

This memorandum summarizes the telephone discussion on April 16, 2008, between the U.S. Nuclear Regulatory Commission (NRC) staff and Nebraska Public Power District (NPPD, the licensee). The discussion was in regard to the licensee's request for relief RI-35 for Cooper Nuclear Station (CNS). Participants in the discussion included T. McClure, D. Madsen, and R. Estrada (NPPD), and M. Mitchell, E. Andruszkiewicz, and F. Lyon (NRC).

By letter dated January 30, 2008, as supplemented by letters dated March 27 and April 11, 2008, NPPD submitted a request for an alternative for CNS from certain American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) requirements under the provisions of Title 10 of the *Code of Federal Regulations* 50.55a(a)(3)(i). The licensee's March 27, 2008 submittal was a complete revision of the original January 30, 2008 submittal.

Specifically, NPPD requested permission to implement weld overlay repairs in accordance with the provisions of ASME Code Cases N-504-3, "Alternative Rules for Repair of Classes 1, 2, and 3 Austenitic Stainless Steel Piping," and N-638-1, "Similar and Dissimilar Metal Welding Using Ambient Temperature GTAW Temper Bead Technique," for the welds listed on page 1 of the attachment to the licensee's March 27, 2008, submittal. These weld overlay repairs may be implemented to address any potential unacceptable flaw indications discovered during inspection of the subject welds during the CNS spring 2008 refueling outage. The weld overlay repairs would be implemented as an alternative to meeting specific requirements in ASME Code, Section XI, Article IWA-4000 as identified in the licensee's March 27, 2008 submittal.

NPPD's proposed alternative with regard to the implementation of weld overlay repairs and the nondestructive examination of the weld overlays after installation was documented in the licensee's March 27 and April 11, 2008 letters. Specifically, this included information on:

1. the materials with which the weld overlays would be manufactured
2. the materials to which the overlays may be applied
3. the temperbead welding process to be used for the overlays

4. the design requirements the overlays will meet
5. the inspection of the original welds prior to application of the overlays, and
6. the preservice examination and testing that will be performed on the overlays after installation.

The NRC staff has completed its review of the information provided by the licensee. The licensee provided information in its submittals to demonstrate that the proposed alternative would maintain an acceptable level of quality and safety with regard to ensuring the integrity of the CNS reactor coolant pressure boundary welds listed in RI-35 under all licensing basis conditions of operation.

The NRC staff concluded that NPPD provided adequate information regarding the inspection of the welds prior to overlay application, design features of the weld overlays, installation of the weld overlays, and preservice inspection and testing of the weld overlays to substantiate their implementation as acceptable alternative repairs.

Therefore, RI-35 is verbally authorized by the Branch Chief, Vessels and Internals Integrity Branch, and the Acting Branch Chief, Plant Licensing Branch IV, for the CNS spring 2008 refueling outage (RE-24), in accordance with the information provided in the licensee's letters dated March 27, 2008, and April 11, 2008. The NRC's written final safety evaluation will follow as a matter of routine.

The licensee had no additional comments or questions.

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