



Nebraska Public Power District

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June 7, 1993

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Reactor Vessel Beltline Weld Inspections
Cooper Nuclear Station
NRC Docket No. 50-298, DPR No. 46

Gentlemen:

A recent revision to 10CFR50.55a, which became effective on September 8, 1992, imposes on licensees such as Cooper Nuclear Station, an augmented examination of reactor vessel shell welds as specified in the 1989 Edition of Section XI of the ASME Code. These examinations are to be made on essentially all Reactor Pressure Vessel (RPV) shell welds and within the schedule stated in the regulation. The Nebraska Public Power District (the District) presently plans to commence performing these inspections prior to 1996 based on our current schedule for refueling outages and our ten year inservice inspection interval.

The inspection criteria for RPV shell weld examinations will change in 1996 with the adoption of Appendix VIII of ASME Section XI for pressure vessel examination qualifications. Appendix VIII will significantly change the requirements for demonstrating the adequacy of nondestructive examination procedures and inspection personnel from those presently specified by the code. The resources needed to implement Appendix VIII are not expected to be developed or available in time to support reactor vessel shell examinations prior to 1996. Hence, the RPV shell weld inspections performed by the District prior to 1996 most likely will not be to the Appendix VIII criteria.

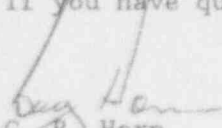
There is a concern among licensees, including the District, that RPV shell weld examinations performed prior to the implementation of Appendix VIII could somehow be ruled invalid or inadequate. If this was the case, then RPV shell weld examinations conducted prior to 1996 would have to be reperformed at an additional cost of resources and personnel exposure. The possibility of a requirement to reexamine welds to Appendix VIII criteria creates uncertainty in our planning which is significant due to the large impact which may be incurred.

The District requests consideration of this concern by the NRC. Notification of the NRC's position on this matter, to the industry, would remove the uncertainty and would assist utilities in their planning for the most effective implementation of RPV shell weld examinations.

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If you have questions on this matter, please call.


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