



# Nebraska Public Power District

COOPER NUCLEAR STATION  
P.O. BOX 98, BROWNVILLE, NEBRASKA 68321  
TELEPHONE (402) 825-2222

CNSS948056

February 17, 1994

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

Dear Sir:

Cooper Nuclear Station Licensee Event Report 93-026, Revision 1, is forwarded as an attachment to this letter.

Sincerely,

R. L. Gardner  
Plant Manager

RLG/nc

Attachment

cc: L. J. Callan  
G. R. Horn  
J. M. Meacham  
R. E. Wilbur  
V. L. Wolstenholm  
D. A. Whitman  
INPO Records Center  
NRC Resident Inspector  
R. J. Singer  
CNS Training  
CNS Quality Assurance  
CNS Regulatory Compliance Specialist

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PDR ADOCK 05000298  
S PDR

*TELL*  
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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Cooper Nuclear Station	DOCKET NUMBER (2) 0 5 0 0 0 2 9 8 1	PAGE (3) 1 OF 0 3
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TITLE (4)  
Noncompliance With ASME Section XI Inspection And Test Requirements Associated With Safety-Related Portions Of The Service Water And Reactor Equipment Cooling Systems

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
0	6	18	93	026	0	0	1	02			0 5 0 0 0
											0 5 0 0 0

OPERATING MODE (9)  N

POWER LEVEL (10) 0 1 0 1 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)

20.402(b)	20.405(a)	50.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.36(e)(1)	50.73(a)(2)(v)	73.71(e)
20.405(a)(1)(ii)	50.36(e)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Donald L. Reeves, Jr.	TELEPHONE NUMBER
	AREA CODE: 4 0 2 8 2 5 - 3 8 1 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On June 18, 1993, it was determined safety related portions of the Service Water (SW) and Reactor Equipment Cooling (REC) system piping had not been included in the ASME Code Section XI Inservice Inspection (ISI) program as required by 10CFR50.55a(g). The requirement specified in 10CFR50.55a(g), effective February 12, 1976, states that for plants such as Cooper Nuclear Station whose construction permit was issued prior to January 1, 1971, safety related components not part of the reactor coolant pressure boundary must meet the inspection requirements for ASME Code Class 2 and 3 components. At that time, this was evaluated and considered to not apply to the SW and REC systems since they were classified as IVP, USAS B31.1.0-1967 systems in accordance with the approved CNS design basis. Consequently, since these two systems were not included in the original ISI program, the safety related portions of these two systems were never included in the ASME Section XI ISI program. The Technical Specifications require compliance with the requirements contained in Section XI of the ASME Boiler and Pressure Vessel Code.

The safety related portions of the SW and REC systems will be included in the ASME Section XI ISI program by the next refueling outage. In addition, other safety related non-code Class 1, 2, or 3 systems will be evaluated for reclassification regarding Section XI test and inspection. This evaluation will be completed and applicable portions of other systems will be included in the ISI program by the next refueling outage.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR  9 3	SEQUENTIAL NUMBER  0 2 6	REVISION NUMBER  0 1			
					0 2	OF 0 3	

TEXT (if more space is required, use additional NRC Form 366A's) (17)

A. Event Description

On June 18, 1993, it was determined safety related portions of the Service Water (SW) and Reactor Equipment Cooling (REC) system piping had not been included in the ASME Code Section XI Inservice Inspection (ISI) program as required by 10CFR50.55a(g). The requirement specified in 10CFR50.55a(g), effective February 12, 1976, states that for plants such as Cooper Nuclear Station (CNS) whose construction permit was issued prior to January 1, 1971, safety related components not part of the reactor coolant pressure boundary must meet the inspection requirements for ASME Code Class 2 and 3 components.

Contrary to these requirements, the safety related portions of the SW and REC systems, which had not been included in the initial licensed ISI program, were not updated to the requirements relative to ASME Section XI.

B. Plant Status

At the time of discovery, the plant was in cold shutdown, in the 1993 Refueling Outage. Since the plant has not been in compliance with 10CFR50.55a(g) since it became effective on February 12, 1976, plant operation during the period this condition existed has ranged from shutdown to 100 percent power. The plant has been returned to power operation.

C. Basis for Report

The Technical Specifications require compliance with the requirements contained in Section XI of the ASME Boiler and Pressure Vessel Code. On June 18, 1993, this condition was documented as a potential violation of Technical Specifications by the NRC. Subsequently, on August 13, 1993, upon further evaluation it was determined safety related portions of the SW and REC systems should have been included in the ISI program. Therefore this event is being reported as a condition prohibited by Technical Specifications, in accordance with the criteria prescribed by 10CFR50.73(a)(2)(i).

D. Cause

This condition was caused by a deficiency in the evaluation of 10CFR50.55a when it was promulgated in 1976. CNS was designed and constructed without reference to Regulatory Guide 1.26 quality group classifications. Instead, the CNS FSAR utilized the construction contractor's classification system. Under that system, the CNS SW and REC systems were classified as IVP, USAS B31.1.0-1967 systems. This quality group classification was part of the accepted design basis of the plant. Consequently, since these two systems were not included in the original ISI program, the safety related portions of these two systems were never included in the ASME Section XI ISI program.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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		YEAR 9   3	SEQUENTIAL NUMBER -   0   2   6	REVISION NUMBER -   0   1			

TEXT (If more space is required, use additional NRC Form 366A's) (17)

E. Safety Significance

The exclusion of the SW and REC systems from the ASME Section XI ISI program has resulted in operation of the systems since 1976 without conduct of hydrostatic pressure testing and repairs/replacements in accordance with ASME Section XI. However, the absence of pressure testing has had a minimal effect on safety due to the performance of a sufficient number of SW and REC system ultrasonic examinations under the erosion/corrosion programs to assure structural integrity. Additionally, the inspections addressing biofouling, silt, and debris in the SW system provide reasonable assurance that SW flow is capable of removing shutdown, normal operational, and design basis accident heat loads. Also, since the systems have been maintained as safety related, they have been subject to the same repair procedures and material quality requirements that would be imposed by the Section XI repair/replacement program. Further, piping support examinations have been conducted for both systems under the augmented (non-Section XI) ISI program.

F. Safety Implications

System performance is not dependent solely on compliance with 10CFR50.55a(g). The additional inspections and maintenance requirements on these systems, as described above, provide reasonable assurance they are capable of fulfilling their intended safety functions.

G. Corrective Action

The safety related portions of the SW and REC systems will be included in the ASME Section XI ISI program by the next refueling outage. In addition, other safety related non-code Class 1, 2, or 3 systems will be evaluated for reclassification regarding Section XI test and inspection. This evaluation will be completed and applicable portions of other systems will be included in the ISI program by the next refueling outage.

H. Similar Events

None