NOV 8 - 1982

Docket No. 50-298

Mr. J. M. Pilant, Director Licensing & Quality Assurance Nebraska Public Power District P. O. Box 499 Columbus, Nebraska 68601

Dear Mr. Pilant:

SUBJECT: RESPONSE TO GENERIC LETTER 81-04 ON IMPLEMENTATION OF NUREG-0313, REV. 1

Re: Cooper Nuclear Station

Our Generic Letter 81-04 to all BWR licenses dated February 26, 1981 requested you to review all ASME Code Class 1 and 2 pressure boundary piping, safe ends and fitting material at your BWR facilities to determine if it meets the material selection, testing and processing guidelines set forth in NUREG-0313, Rev. 1, a copy of which was enclosed with the generic letter. This letter requested that you propose a schedule to: 1) identify any materials that do not meet the guidelines, 2) implement the augmented inservice inspection requirements specified in Section IV of MUREG-0313, Rev. 1, 3) discuss your plans to replace (to the extent practicable) nonconforming materials and 4) install more sensitive, diverse leak detection systems. Our generic letter offered the option of providing a description, schedule and justification for alternative actions that would reduce the susceptibility of pressure boundary piping and safe ends to intergranular stress corrosion cracking (IGSCC) or increase the probability of early detection of leakage from pipe cracks.

Based on our review of your response to our Generic Letter 81-04, we have determined that we need the additional information identified in the enclosure to this letter. In view of recent developments regarding pipe cracking in BWRs, we request that you respond within 30 days of receipt of this letter. We also request that you send a copy of your response directly to our contractor:

EG&G Idaho, Inc. P. O. Box 1625 Idaho Falls, Idaho 83415 ATTN: Mr. Wayne Roberts

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This request for information is specific to one licensee. Therefore, OMB clearance is not required for this request under P. L. 96-511.

If you have any questions, please contact your Project Manager, Byron Siegel at 301-492-7534.

Sincerely,

Original signed by D. B. Vassallo

Domenic B. Vassallo, Chief Operating Reactors Branch #2 Division of Licensing

Enclosure: Request for Additional Information

cc w/enclosure: See next page

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Mr. J. M. Pilant Nebraska Public Power District

cc:

Mr. G. D. Watson, General Counsel Nebraska Public Power District P. O. Box 499 Columbus, Nebraska 68601

Mr. Arthur C. Gehr, Attorney Srell & Wilmer 3100 Valley Center Phoenix, Arizona 85073

Cooper Nuclear Station ATTN: Mr. L. Lessor Station Superintendent P. O. Box 98 Brownville, Netraska 68321

Director Nebraska Dept. of Environmental Control P. O. Box 94877, State House Station Lincoln, Nebraska 68509

Mr. William Siebert, Commissioner Nemaha County Board of Commissioners Nemaha County Courthouse Auburn, Nebraska 68305

Mr. Dennis Dubois USNRC Resident Inspector P. O. Box 218 Brownville, NE 68321

U. S. Environmental Protection Agency Region VII Office Regional Radiation Representative 324 East 11th Street Kansas City, MO 64106 John T. Collins Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Request for Additional Information Implementation of NUREG-0313, Rev. 1 Cooper Nuclear Station Docket No. 50-298

 Determining coolant inventory changes (IV.B.1.a.(2) of NUREG-0313 Rev. 1).

In the J. M. Pilant letter to D. G. Eisenhut dated July 1, 1981, items that could assist the operator to determine coolant inventory changes were listed. Please fill out the attached table on these items and apparatus which identifies and quantifies the unidentified leakage rate.

- Augmented Inservice Inspection (ISI) (IV.B of NUREG-0313 Rev. 1). The J. M. Pilant letter to D. G. Eisenhut letter dated July 1, 1981 indicated that the Cooper Nuclear Station ISI program on welds will use the General Electric (GE) stress rule index (SRI).
 - a. Please indicate how the SRI will be used in the ISI program. For example, will the SRI be used to select which welds will be inspected the ISI program?
 - b. Please provide technical justification (reports, etc.) for the use to which the SRI will be put in the ISI program.
- 3. Augmented ISI of Nonconforming Nonservice Sensitive Piping
 - a. Please identify the methods for augmented ISI of the nonconforming nonservice sensitive piping (IV.B.3 of NUREG-0313 Rev. 1).
 - b. Please provide a copy of the specifications for the augmented ISI method or methods (IV.B.3 of NUREG-0313 Rev. 1).
 - c. Identify each of the augmented ISI methods used and the training and certification levels the individuals using those methods received. Indicate if cracked specimens are used in your training (IV.B.3 of NUREG-0313 Rev. 1).
 - d. Identify the proportion of the nonconforming nonservice sensitive piping that is being inspected (IV.B.2.b of NUREG-0313 Rev. 1).
 - e. Identify the Stress Rule Index Numbers for the welded joints in the nonconforming nonservice sensitive piping (IV.B.1.b(6) of NUREG-0313 Rev. 1).
 - f. Identify the proposed inspection interval for each system of nonconforming nonservice sensitive piping (IV.B.1.b of NUREG-0313 Rev. 1).
- 4. Augmented ISI of Nonconforming Service Sensitive Pipe
 - a. Please identify the methods for augmented ISI of the nonconforming service sensitive pipe (IV.B.3 of NUREG-0313 Rev. 1).

- b. Provide a copy of the specifications for the augmented ISI method or methods (IV.B.3 of NUREG-0313 Rev. 1).
- c. Identify each of the augmented ISI methods used and the training and certification levels the individuals using those methods received. Indicate if cracked specimens are used in your training (IV.B.3 of NUREG-0313 Rev. 1).
- d. Identify the proportion of the nonconforming service sensitive pipe that is being inspected (IV.B.2.b of NUREG-0313 Rev. 1).
- e. Identify the inspection interval of each system of the nonconforming service sensitive pipe (IV.B.2.b of NUREG-0313 Rev. 1).
- f. Identify the Stress Rule Index Numbers for the welded joints in the nonconforming service sensitive pipe (IV.B.l.b (6) of NUREG-0313 Rev. 1).
- 5. Coolant Leakage (IV.B.1.b(2) of NUREG-0313 Rev. 1) NUREG-0313 Rev. 1 requires that:

Plant shutdown should be initiated for inspection and corrective action when any leakage detection system indicates, within a period of 24 hours or less, an increase in rate of unidentified leakage in excess of 2 gallons per minute or its equivalent, or when the total unidentified leakage attains a rate of 5 gallons per minute or its equivalent, whichever occurs first. For sump level monitoring systems with fixed-measurement interval method, the level should be monitored at 4-hour intervals or less.

Please provide technical justification for not including this in your Technical Specifications. This justification should be include data or operating experience.

INFORMATION RE	QUESTED	ON	LEAK	DETECTION	SYSTEM
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	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Type of System	Is System Operable (yes/no)	Leak Rate Sensitivity (gpm)	Time Required To Achieve Sensitivity (hours)	Is System Functional After SSE (yes/no)	Control Room Indications (alarms) (recorders)	Calibration or Testing During Operation (yes/no)	Documentation Reference for (1) Thru (6)