



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REGULATION

EVALUATION OF NEBRASKA PUBLIC POWER DISTRICT'S RESPONSE TO

GENERIC LETTER (GL) 88-01 SAFETY EVALUATION

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NO. 50-298

1.0 INTRODUCTION

By letters dated April 30, and October 9, 1990, Nebraska Public Power District (licensee) submitted its Generic Letter (GL) 88-01 positions concerning Technical Specification (TS) amendments in response to the staff's Safety Evaluation (SE) dated February 14, 1990. In the SE dated February 14, 1990, the staff did not find the licensee's GL 88-01 positions acceptable in the following areas:

1. The licensee provided conflicting and inconsistent information concerning intergranular stress corrosion cracking (IGSCC) classifications and accessibility of welds for inspection.
2. The licensee's position not to amend the TS to include a statement on inservice inspection (ISI) as required by GL 88-01.
3. The licensee's position not to amend the TS to include a requirement of limiting the increase in unidentified leakage to 2 gpm over a period of 24 hours or less as required by GL 88-01.
4. The licensee's position concerning crack evaluation and repair criteria.

In response to the staff's SE dated February 14, 1990, the licensee has proposed in its letter dated April 30, 1990, a commitment to implement the provisions that are identical to the staff's positions stated in GL 88-01. The licensee does not believe that it is necessary to amend their license in addition to its commitment. The licensee believes any submission of TS amendments regarding enhanced leakage and an ISI statement is unwarranted and is voluntary in nature. Furthermore, in the letter dated April 30, 1990, the licensee indicated that it had implemented the SE recommendations made by the staff with regard to weld classification, conflict of information pertaining to inaccessible welds that were reported to be inspected, and that it will conform to the staff's position on reporting requirements concerning crack evaluation and repair criteria as recommended in GL 88-01.

In the letter dated October 9, 1990, the licensee indicated that it had re-evaluated the need to replace all of the Reactor Water Clean-up (RWCU) System's piping, and has determined that complete replacement is not required to assure the continued long-term integrity and reliability of the piping.

Thus, the licensee has proposed to revise its commitment to replace the remaining RWCU piping and will instead conduct appropriate continuing inspection of the accessible weldments in this piping.

2.0 DISCUSSION

The licensee's proposed GL 88-01 positions in their letters dated April 30, and October 9, 1990, has been reviewed by the staff and evaluated below as follows:

1. The licensee's response to the staff's concern regarding conflicting and inconsistent information of IGSCC classifications and accessibility of welds for inspection was found to be acceptable. The licensee provided a new listing that accounts for portions of the RWCU System that were replaced with IGSCC resistant material during the 1990 refueling outage. The resulting new welds were identified in the comments column of the new listing and the welds removed by the RWCU pipe replacement have been deleted. All inaccessible welds have been classified as IGSCC Category G and Weld RCA-BF-1 has been reclassified as IGSCC Category D. All welds reported to have cracks in the licensee's letter dated July 24, 1989, have been either replaced or repaired, and those identified incorrectly as having cracks have been corrected accordingly. No welds described in the licensee's attachment have flaw indications, consequently there are no IGSCC Category F welds.
2. The licensee's response to the staff's GL 88-01 position regarding a TS amendment that includes a statement on inservice inspection (ISI) was found to be unacceptable. The licensee must amend Cooper's TS to include a statement on ISI as delineated in GL 88-01. The staff's GL 88-01 position regarding the ISI statement was approved by the CRGR and that the subject ISI statement will be included in the Improved BWR Standardized TS under the administrative controls section.
3. The licensee's response to the staff's GL 88-01 position regarding a TS amendment to include a requirement of limiting the increase in unidentified leakage to 2 gpm over a period of 24 hours or less was found to be unacceptable. The staff's GL 88-01 positions regarding leakage limits, detection frequency and operability of leakage detection instruments were approved by the CRGR, and the subject TS leakage position will be included in the Improved BWR Standardized TS.
4. The licensee's response to the staff's GL 88-01 concern regarding reporting of flaws and flaw evaluation was found to be acceptable. The licensee will conform to the staff's positions on reporting requirements as stated in GL 88-01. The licensee will notify the NRC of any flaws identified that do not meet IWB-3500 criteria of Section XI of the Code for continued operation without evaluation, or a change found in condition of welds previously known to be cracked. The licensee will also notify the NRC of flaw evaluation required for continued operation and/or flaw repair plans.

5. The licensee's decision not to replace all of the RWCU piping and its proposal to conduct appropriate continuing inspections of the subject piping was found to be acceptable. The licensee may inspect 10% of the weld population of the RWCU piping out-board of the containment isolation valves instead of 100% as recommended in GL 88-01.

3.0 CONCLUSION

Based on the review of the licensee's submittals dated April 30, and October 9, 1990, the staff concludes that the licensee's position not to amend Cooper's TS to include the staff's GL 88-01 position regarding an ISI statement and leakage detection as discussed above is not acceptable. The licensee's positions on weld classifications and inconsistent information, reporting of flaws and flaw evaluation, and the decision not to continue to replace RWCU piping and to conduct appropriate continuing inspections were found to be acceptable. The staff recognizes that the licensee replaced piping with IGSCC resistance piping material. However, this does not make the piping necessarily immune to IGSCC. Therefore, the staff requires that the licensee amend Cooper Nuclear Station's TS to conform to the staff's TS amendment positions on an ISI statement and leakage detection as delineated in GL 88-01.

Dated: February 25, 1991

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