

Nebraska Public Power District

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March 14, 1991

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Reactor Water Cleanup Piping Inspection
Cooper Nuclear Station
NRC Docket No. 298, License No. DPR-46

- Reference:
- 1) Letter from G. A. Trevors to USNRC, dated October 9, 1991, Generic Letter 88-01
 - 2) Letter from P. W. O'Connor (NRC) to G. R. Horn dated February 21, 1991, Cooper Nuclear Station - Review of Nebraska Public Power District's Request Regarding Reactor Water Cleanup Piping (TAC No. 69131)

Gentlemen:

In Reference (1), Nebraska Public Power District (District) proposed to revise an earlier commitment to the NRC involving the replacement of all Reactor Water Cleanup (RWCU) piping and welds with those composed of materials resistant to Intergranular stress corrosion cracking. Portions of this piping had previously been replaced with resistant material but the District proposed to leave the remaining piping and welds in place and to implement the applicable inspection extent and schedule for the accessible welds in accordance with the guidance of Generic Letter 88-01. This proposal was found acceptable by the NRC as documented in Reference (2).

The District wants to be sure of the correct understanding of what was stated in the last sentence of Reference (2). This sentence reads "NPPD may inspect 10% of the weld population of the RWCU piping outboard of the containment isolation valves instead of 100% as recommended in Generic Letter 88-01." The District believes this statement applies only to inspection of the non-resistant materials with no stress improvement (Category D per Generic Letter 88-01) which are on those accessible portions of RWCU piping that were not replaced. The last sentence in Reference (2) then allows the District to inspect 10% of the Category D welds every two refueling outages, instead of inspecting 100% of these weld types every two refueling outages as recommended in Generic Letter 88-01. The District believes the inspection extent and schedule for the portions of the RWCU system replaced with resistant materials (Category A per Generic Letter 88-01) are not affected by Reference (2).

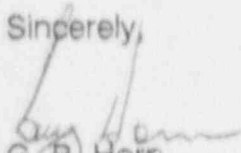
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If the District's understanding of the above is in error, please provide notification of such.

Sincerely,



G. R. Horn
Nuclear Power Group Manager

cc: Regional Administrator
NRC - Region IV
Arlington, Texas

NRC Resident Inspector
Cooper Nuclear Station