



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 5, 2023

Mr. John Dent, Jr.
Executive Vice President and
Chief Nuclear Officer
Nebraska Public Power District
72676 648A Avenue
P.O. Box 98
Brownville, NE 68321

SUBJECT: COOPER NUCLEAR STATION – REGULATORY AUDIT PLAN IN SUPPORT
OF RELIEF REQUEST RC3-02 REGARDING DRYWELL HEAD BOLTING
(EPID L-2023-LLR-0035)

Dear Mr. Dent:

By letter dated June 27, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23178A273), Nebraska Public Power District (the licensee) submitted a relief request for Cooper Nuclear Station, seeking relief from certain inservice inspection requirements concerning drywell head bolting in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g)(5)(iii). The relief request pertains to the visual inspection requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, “Rules for Inservice Inspection of Nuclear Power Plant Components.”

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the licensee’s application and determined that a regulatory audit will assist in the timely completion of the review. The NRC staff will conduct a regulatory audit to support its review in accordance with the enclosed audit plan. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information.

The NRC staff will conduct the audit to increase its understanding of the application and identify information that will require docketing to support the NRC staff’s regulatory findings. The NRC staff will conduct the audit virtually as soon as the portal can be established and through November 17, 2023.

J. Dent, Jr.

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If you have any questions, please contact me at 301-415-4037 or by email to Thomas.Wengert@nrc.gov.

Sincerely,

/RA/

Thomas J. Wengert, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-298

Enclosure:
Audit Plan

cc: Listserv

REGULATORY AUDIT PLAN
IN SUPPORT OF RELIEF REQUEST RC3-02 REGARDING
RELIEF FROM INSERVICE INSPECTION CRITERIA FOR DRYWELL HEAD BOLTING
NEBRASKA PUBLIC POWER DISTRICT
COOPER NUCLEAR STATION
DOCKET NO. 50-298

1.0 BACKGROUND

By letter dated June 27, 2023 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML23178A273), Nebraska Public Power District (NPPD, the licensee) submitted a relief request for Cooper Nuclear Station, seeking relief from certain inservice inspection (ISI) requirements concerning drywell head bolting in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g)(5)(iii), "ISI program updated: Notification of impractical ISI Code requirements." The relief request pertains to the visual inspection requirements per the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components."

The U.S. Nuclear Regulatory Commission (NRC) staff from the Office of Nuclear Reactor Regulation (NRR) has initiated its review of the relief request in accordance with NRR Office Instruction LIC-102, "Review of Relief Requests, Proposed Alternatives, and Requests to Use Later Code Editions and Addenda," Revision 3, dated April 6, 2020 (ML18351A218).

2.0 REGULATORY AUDIT BASIS

A regulatory audit is a planned license- or regulation-related activity that includes the examination and evaluation of primarily non-docketed information associated with the relief request. An audit is conducted to gain understanding, to verify information, and to identify information that will require docketing to support the basis of a licensing or regulatory decision. An audit will assist the NRC staff in efficiently conducting its review and gaining insights to the licensee's processes and procedures. Information identified during the audit that the NRC staff relies upon to make the safety determination must be submitted on the docket. This audit will be conducted in accordance with NRR Office Instruction LIC-111, "Regulatory Audits," Revision 1, dated October 31, 2019 (ML19226A274), with exceptions noted within this audit plan.

3.0 REGULATORY AUDIT SCOPE AND METHODOLOGY

NRC's objectives of the audit are the following:

- Identify questions and requests that may become formal requests for additional information (RAIs) per NRR Office Instruction LIC-115, "Processing Requests for Additional Information," Revision 1, dated August 5, 2021 (ML2141A238).

- Identify any information needed to be submitted on the docket.
- Clarify that the submittal is for an impracticality relief request pursuant to 10 CFR 50.55a(g)(5)(iii), not an alternative request pursuant to 10 CFR 50.55a(z), "Alternatives to codes and standards requirements."
- Gain a better understanding of the plant's previous ISI inspections and their implications for the relief request.

4.0 INFORMATION AND OTHER MATERIAL NECESSARY FOR THE AUDIT

The NRC staff requests that the licensee have the following information readily available and accessible for the NRC staff's review via an internet-based portal:

- Documentation concerning 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," test results/reports of the drywell head-to-drywell shell flange joint over the past 10 years.
- VT-3 bolting examination results/reports during the previous second 10-year containment ISI interval.
- Stress calculations or qualitative analysis of the containment drywell head bolts demonstrating that structural integrity and leak tightness is maintained, assuming the bolts that could not be examined have failed their intended function and could not be tightened.
- Analyses, tests, or examinations demonstrating leak tightness, assuming that the bolts that could not be examined failed and could not be tightened.
- The construction drawings of the containment drywell head including flanges and bolts.
- Photos of the containment drywell head bolting from different locations and angles.
- Plant procedure to perform the VT-1 bolting examination.
- Non-conformance reports and corrective actions taken for the containment drywell head bolts, if any.
- Information related to alternative examination techniques to inspect the subject bolts that were considered but were not adopted and a discussion of the reasons why those examination techniques were not used.

Based on the review of the above documents, the NRC staff will determine whether it needs to request any additional documents to be made available on the portal or whether additional information needs to be submitted on the docket for the staff to complete the review of the requested changes.

5.0 TEAM ASSIGNMENTS

The audit team will consist of the following NRC staff from NRR:

- Thomas Wengert, Plant Licensing Branch IV (LPL4)
- Thomas Byrd, LPL4
- George Wang, Structural, Civil, Geotech Engineering Branch (ESEB)
- David Dijamco, Vessels and Internals Branch (NVIB)
- John Tsao, NVIB

6.0 LOGISTICS

The audit will be conducted from September 18, 2023, through November 17, 2023, through an online portal (also known as electronic portal, ePortal, or electronic reading room) established by NPPD.

If requested, the audit team will conduct a telephone conference with the licensee for the purposes of introducing the team, discussing the scope of the audit, and describing the information to be made available on the internet portal. The audit team will also confirm with the licensee if the information made available on the online portal contains any sensitive or proprietary information. The audit team expects to request that representatives of NPPD answer audit team questions during the audit related to information provided on the portal at a mutually agreeable day and time by telephone conference. An exit meeting/call will be held at the conclusion of the audit.

The NRC staff requests the licensee to have the information referenced in section 4.0 of this audit plan available and accessible for the NRC staff's review via an internet-based portal within 2 weeks of the date of this audit plan. The NRC's licensing project manager will inform the licensee via routine communications when the NRC staff no longer needs access to the portal. The NRC staff requests the licensee to notify the review team when an audit item is added to its portal by sending an email to the NRC licensing project manager.

The NRC staff does not foresee the need for an onsite visit or in-person discussions between the NRC and licensee staff to discuss information to be provided on the portal at this time. However, if the need for a such a meeting is identified in the future, the audit plan will be revised, and the schedule for the audit will be adjusted accordingly. The NRC project manager will coordinate any changes to the audit schedule and location with the licensee.

7.0 SPECIAL REQUESTS

The NRC requests access to requested documents and information through a web-based portal that allows the NRC staff to access documents over the internet. The following conditions associated with the online portal must be maintained while the NRC staff have access to the online portal:

- The online portal will be password-protected. A separate password will be assigned to each member of the NRC staff participating in the audit.
- The online portal will prevent the NRC participants from printing, saving, downloading, or collecting any information directly from the online portal.

Username and password information should be provided directly to members of the NRC staff as needed. The NRC licensing project manager will provide the licensee with names and contact information of the NRC staff participating in the audit. All other communications should be coordinated through the NRC project manager.

8.0 DELIVERABLES

The NRC staff will develop any RAIs, as needed, in accordance with NRR Office Instruction LIC-115, Revision 1, and will issue such RAIs separately from audit-related correspondence. The NRC staff will prepare and issue an audit summary report prior to completing its review of the relief request.

SUBJECT: COOPER NUCLEAR STATION – REGULATORY AUDIT PLAN IN SUPPORT OF RELIEF REQUEST RC3-02 REGARDING DRYWELL HEAD BOLTING (EPID L-2023-LLR-0035) DATED SEPTEMBER 5, 2023

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ADAMS Accession No.: ML23233A188

***By email**

NRR-028

OFFICE	NRR/DORL/LPL4/PM*	NRR/DORL/LPL4/PM*	NRR/DORL/LPL4/LA*	NRR/DEX/ESEB/BC*
NAME	TByrd	TWengert	PBlechman	ITseng
DATE	8/21/2023	8/21/2023	8/28/2023	9/5/2023
OFFICE	NRR/DNRL/NVIB/BC*	NRR/DORL/LPL4/BC*	NRR/DORL/LPL4/PM*	
NAME	ABuford	JDixon-Herrity (Slee for)	TWengert	
DATE	8/28/2023	9/5/2023	9/5/2023	

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