

**From:** [Thomas Byrd](#)  
**To:** [Dewhirst, Linda R.](#); [Unruh, Mark E.](#); [Van Der Kamp, David W.](#)  
**Subject:** Acceptance - Cooper Nuclear Station - Relief Request 50.55a(z)(2) RR6-01 Code Case N-513-5 (EPID L-2025-LLR-0052)  
**Date:** Wednesday, June 18, 2025 8:20:00 AM  
**Attachments:** image001.png

---

By letter dated May 12, 2025, (Agencywide Documents and Access Management System (ADAMS) Accession No. ML25132A198) Nebraska Public Power District (licensee) requested Nuclear Regulatory Commission (NRC) approval to use a proposed alternative to certain inservice code requirements of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for Cooper Nuclear Station (CNS) pursuant to 10 CFR 50.55a. The 10 CFR 50.55a request pertains to the application of ASME Code Case N-513-5 "Evaluation Criteria for Temporary Acceptance of Flaws in Moderate Energy Class 2 or 3 Piping and Gate Valves Section XI, Division 1" at a higher system operating pressure for the sixth and seventh twelve-year inservice inspection interval.

Pursuant to 10 CFR 50.55a(z)(2), the licensee submitted Relief Request RR6-01 for an alternative repair/replacement activity using Code Case N-513-5 for a degraded Residual Heat Removal Service Water Booster (RHRSWB) piping which has a maximum operating pressure of more than 275psig.

The purpose of this email is to provide the results of the Nuclear Regulatory Commission (NRC) staff's acceptance review of this relief request. The acceptance review was performed to determine if there is sufficient information in scope and depth to allow for the NRC staff to complete its detailed technical review of the request. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements, code, or licensing basis of the plant.

Pursuant to Sections 50.55a(z)(1) and 50.55a(z)(2) of Title 10 of the *Code of Federal Regulations* (10 CFR), the applicant shall demonstrate that the proposed alternatives would provide an acceptable level of quality and safety, or that compliance with the specified requirements of Section 50.55a would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the staff to proceed with its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment request in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

The NRC staff has evaluated precedence related to this request and determined that, on average, the reviews have required 120 hours and 10 months. To support a more efficient process, the NRC is setting a goal of achieving a 15% improvement. Based on that, our estimate for this review is 100 hours and 6 months. The NRC staff expects to complete the

review by December 12, 2025. If there are emergent complexities or challenges in our review that would change the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with new estimates, will be communicated during our routine interactions.

These estimates are based on the NRC staff's initial review of the application, and they could change due to several factors, including requests for additional information, or unanticipated addition to the scope of the review.

If you have any questions, please contact me

Thomas Byrd  
Project Manager - Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation  
OWFN 08F10

