

From: [Thomas Byrd](#)
To: [Dewhirst, Linda R.](#); [Unruh, Mark E.](#); [Van Der Kamp, David W.](#)
Subject: Cooper - Request for Confirmatory Information RE: Relief Request IST ASME 2022 - RP-01 (EPID L-2025-LLR-0028)
Date: Friday, June 20, 2025 9:30:00 AM
Attachments: RAI-10644-R1-FINAL.docx
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By letter dated March 4, 2025 (ML25065A116), Nebraska Public Power District (licensee) requested that the Nuclear Regulatory Commission (NRC) grant relief from certain Inservice Testing (IST) code requirements for Cooper Nuclear Station (Cooper) pursuant to 10 CFR 50.55a. The relief requests pertain to the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance (OM) of Nuclear Power Plants pump, valve, and snubber testing requirements needed for the next Code of Record (COR) IST interval, which commences on March 1, 2026, and will end on February 28, 2050.

The NRC staff has reviewed the information provided and determined that additional information is required in order to complete the review and approval of the changes. The Nuclear Regulatory Commission (NRC) staff reviewed the submittal and determined that additional information, as described in the attached draft request for confirmatory information (RCI), is required for the staff to complete its review of the application. This RAI is identified as a draft currently to confirm your understanding of the information that the NRC staff needs to complete the evaluation. Please let me know if you would like to have a call with the NRC staff to clarify this request. If the request for information is understood, response to this RCI is due August 1, 2025, 30 days after issuance of this letter.

If there are any questions, please feel free to contact me.

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



REQUEST FOR ADDITIONAL INFORMATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
COOPER - RELIEF REQUEST IST ASME 2022 - RP-01
NEBRASKA PUBLIC POWER DISTRICT
COOPER, UNIT 1
DOCKET NO. 05000298
ISSUE DATE: 06/20/2025

Background

By letter dated March 4, 2025 (ML25065A116), Nebraska Public Power District (licensee) requested that the Nuclear Regulatory Commission (NRC) grant relief from certain Inservice Testing (IST) code requirements for Cooper Nuclear Station (Cooper) pursuant to 10 CFR 50.55a. The relief requests pertain to the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance (OM) of Nuclear Power Plants pump, valve, and snubber testing requirements needed for the next Code of Record (COR) IST interval, which commences on March 1, 2026, and will end on February 28, 2050.

Request for Confirmation of Information 01 (RCI-01):

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Alternative Request RP-01, Section 5, "Proposed Alternative and Basis for Use," states that ASME OM Code Case OMN-32, "Alternative Requirements for Range and Accuracy of Pressure, Flow, and Differential Pressure Instruments Used in Pump Test," Revision 1, is the basis for the alternative request. However, Section 5 also states the following (emphasis underlined):

The analog instruments being used for the suction pressure and discharge pressure for the Group A or Group B tests, as applicable, are designed and calibrated in the range for use at the expected reading to be measured or recorded during the test (e.g. reference value and applicable acceptance criteria). Therefore, all requirements of Code Case OMN-31, revision 1, have been met. The calibration data sheets are available at CNS for inspection, as necessary.

The analog instruments being used are designed and calibrated in the range for use at the expected reading to be measured or recorded during the test (e.g. reference value and applicable acceptance criteria). This relief request is applicable for the flow instrument being used for all potential REC pump tests (i.e. Group A, Comprehensive, Baseline, and Preservice Tests). Therefore, all requirements of Code Case OMN-31, revision 1, have been met. The calibration data sheets are available at CNS for inspection, as necessary.

ASME OM Code Case OMN-31, "Alternative to Allow Extension of ISTA-3120 Inservice Examination and Test Intervals From 10 Years to 12 Years," is not relevant to this alternative request. The NRC staff requests that the licensee confirm that the code case used as the basis for Alternative Request RP-01 is Code Case OMN-32, Revision 1, and not Code Case OMN-31.

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| DATE | 06/13/2025 | 06/04/2025 | 06/02/2025 |