



Nebraska Public Power District

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10 CFR 50.55a

NLS2025045

July 8, 2025

Attention: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: Response to Request for Confirmatory Information Regarding Relief Request
RP-01 (EPID L-2025-LLR-0028)
Cooper Nuclear Station, Docket No. 50-298, Renewed License No. DPR-46

- References:
1. Nebraska Public Power District letter to the U.S. Nuclear Regulatory Commission, NLS2025011, "Inservice Testing Code of Record Interval Relief Requests for Pumps, Valves, and Snubbers," dated March 4, 2025 (ML25065A116)
 2. U.S. Nuclear Regulatory Commission electronic mail to Nebraska Public Power District, "Cooper – Request for Confirmatory Information RE: Relief Request IST ASME 2022 – RP-01 (EPID L-2025-LLR-0028)" dated June 20, 2025

In Reference 1, Nebraska Public Power District (NPPD) submitted requests for relief from certain Inservice Testing (IST) code requirements for Cooper Nuclear Station pursuant to 10 CFR 50.55a. These requests are necessary to support the Code of Record IST interval which commences on March 1, 2026.


In Reference 2, the U.S. Nuclear Regulatory Commission issued a request for confirmatory information (RCI) and requested that NPPD respond by August 1, 2025.

The response to the RCI is attached.

This letter contains no regulatory commitments.

If you have any questions or require additional information, please contact Linda Dewhirst, Regulatory Affairs and Compliance Manager, at (402) 825-5416.

Sincerely,



Khalil Dia
Site Vice President

/dv

Attachment: Response to Request for Confirmatory Information

cc: Regional Administrator w/ attachment
USNRC – Region IV

Cooper Project Manager w/ attachment
USNRC – NRR Plant Licensing Branch IV

Senior Resident Inspector w/ attachment
USNRC – CNS

NPG Distribution w/ attachment

CNS Records w/ attachment

ATTACHMENT

RESPONSE TO REQUEST FOR CONFIRMATORY INFORMATION

Inservice Testing Code of Record Interval Relief Requests for
Pumps, Valves, and Snubbers

Cooper Nuclear Station, Docket No. 50-298

NRC 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):

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.

Nebraska Public Power District (NPPD) Response

NPPD confirms that the reference to Code Case OMN-31 is not relevant, was a typographical error, and that the basis for Alternative Request RP-01 is Code Case OMN-32, Revision 1.