



**Nebraska Public Power District**

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10 CFR 50.55a

NLS2005087

September 19, 2005

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

Subject: Inservice Inspection Relief Request RI-37, Revision 0  
Cooper Nuclear Station, Docket 50-298, DPR-46

The purpose of this letter is to request that the Nuclear Regulatory Commission (NRC) grant the Nebraska Public Power District (NPPD) relief from certain inservice inspection (ISI) code requirements for the Cooper Nuclear Station pursuant to 10 CFR 50.55a. Relief Request RI-37, Revision 0, is applicable to the fourth ten-year ISI interval, which starts March 1, 2006. The basis and details of the relief request are provided in the attachment to this letter. NPPD requests NRC approval of this relief request by February 1, 2006, in support of the start of the fourth ten-year ISI interval.

If you have any questions concerning this matter, please contact Paul Fleming, Licensing Manager, at (402) 825-2774.

Sincerely,

Randall K. Edington  
Vice President – Nuclear and  
Chief Nuclear Officer

/sl

Attachment

A047

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cc: U.S. Nuclear Regulatory Commission w/attachment  
Regional Office – Region IV

Senior Project Manager w/attachment  
USNRC – NRR Project Directorate IV-1

Senior Resident Inspector w/attachment  
USNRC - CNS

NPG Distribution w/o attachment

CNS Records w/attachment

**RELIEF REQUEST NUMBER RI-37, REVISION 0**

**COMPONENT IDENTIFICATION**

Code Classes:	1, 2, and 3
References:	IWA-2210, Table IWA-2210-1
Examination Categories:	All
Item Numbers:	All
Description:	Adoption of Code Case N-686
Component Numbers:	Various

**APPLICABLE CODE EDITION AND ADDENDA  
FOR FOURTH TEN-YEAR INTERVAL**

2001 Edition, 2003 Addenda

**CODE REQUIREMENT**

IWA-2210 of ASME Section XI requires, in part, that visual examinations be conducted in accordance with Table IWA-2210-1. Table IWA-2210-1 provides minimum illumination, maximum direct examination distance, and maximum procedure demonstration lower case character height requirements for performing VT-1, VT-2, and VT-3 visual examinations.

**BASIS FOR RELIEF**

The American Society of Mechanical Engineers (ASME) recognized that the requirements in IWA-2210 and Table IWA-2210-1 were unduly restrictive. As an example, Table IWA-2210-1 requires the examiner to be within six feet of the surfaces being examined, or remote examination equipment that provides demonstrated equivalent resolution is required per IWA-2210. Table IWA-2210-1 also requires a minimum illumination level of 15-foot candles for VT-2 visual examination. However, IWA-5240 allows the examiner to perform examinations for leakage *"...by examining the accessible external exposed surfaces of pressure retaining components....For components whose external surfaces are inaccessible for direct VT-2 visual examination, only the examination of the surrounding area (including floor areas or equipment surfaces located underneath the components) for evidence of leakage shall be required."* This suggests that the examiner may perform VT-2 examinations from the floor without using scaffolding, ladders, or climbing on components.

Experience has shown that a flashlight is a useful tool for locating leakage. When illuminated with a flashlight, water has a "mirror effect," or shiny reflective area, allowing leaks to be located from a distance greater than six feet.

ASME Code Case N-686 provides an alternative to the code requirements of IWA-2210 for performing visual examinations. Pursuant to 10 CFR 50.55a(a)(3)(i) the proposed alternative would provide an acceptable level of quality and safety.

#### **PROPOSED ALTERNATIVE PROVISIONS**

Cooper Nuclear Station (CNS) will use the provisions of Code Case N-686 in its entirety for VT-1, VT-2, and VT-3 visual examinations as alternatives to the requirements of IWA-2210 and Table IWA-2210-1.

#### **APPLICABLE TIME PERIOD**

Relief is requested for the fourth ten-year interval of the Inservice Inspection Program for CNS.

ATTACHMENT 3 LIST OF REGULATORY COMMITMENTS©

Correspondence Number: NLS2005087

The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the Licensing Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITMENT NUMBER	COMMITTED DATE OR OUTAGE
None		