



**Nebraska Public Power District**

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NLS2015075

June 17, 2015

U.S. Nuclear Regulatory Commission

Attention: Document Control Desk

Washington, D.C. 20555-0001

**Subject:** Deviation from BWRVIP-18 and BWRVIP-41 Inspection Requirements  
Cooper Nuclear Station, Docket No. 50-298, DPR-46

- References:**
1. Boiling Water Reactor Vessel and Internals Project (BWRVIP), BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines (BWRVIP-18, Revision 1-A), Electric Power Research Institute (EPRI) Report TR-1025060, dated April 2012
  2. BWRVIP, BWR Jet Pump Assembly Inspection and Flaw Evaluation Guidelines (BWRVIP-41, Revision 3), EPRI Report TR-1021000, dated September 2010

Dear Sir or Madam:

The purpose of this letter is for Nebraska Public Power District (NPPD) to inform the Nuclear Regulatory Commission (NRC) that NPPD missed completing some scheduled reactor vessel core spray piping weld and jet pump assembly weld inspections at Cooper Nuclear Station (CNS) in accordance with BWRVIP-18 and BWRVIP-41, respectively (References 1 and 2). This letter is being submitted per the requirements of BWRVIP-94NP, Revision 2, "Program Implementation Guide."

BWRVIP-18 requires that enhanced visual inspections (EVT-1) be performed to augment ultrasonic testing (UT) volumetric examinations when the volumetric coverage cannot achieve 100% coverage. CNS did not perform the EVT-1 examinations in addition to the UT inspections for certain core spray welds.

BWRVIP-41 requires certain jet pump welds to be examined on a six year frequency. Due to a scheduling error, CNS missed an opportunity in the recent refueling outage 28 to examine these welds and therefore will extend the examination frequency one more cycle until they can be examined in the fall of 2016 during refueling outage 29 (RE29).

Accordingly, a technical justification for deviation from the BWRVIP guidance was developed. The technical justification provides reasonable assurance that the welds will continue to perform their intended design safety function until the welds can be re-inspected in RE29, thus returning CNS to compliance with the BWRVIP requirements.

**COOPER NUCLEAR STATION**

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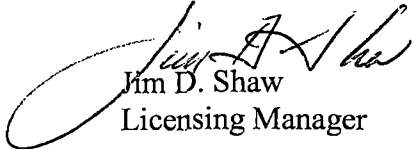
[www.nppd.com](http://www.nppd.com)

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NRK

This letter is being transmitted for information only and CNS is not requesting any action from the NRC staff. No formal licensee commitments are being made in this submittal.

Should you have any questions concerning this matter, please contact me at (402) 825-2788.

Sincerely,



Jim D. Shaw  
Licensing Manager

cc: Regional Administrator  
USNRC - Region IV

Cooper Project Manager  
USNRC - NRR Project Directorate IV- 1

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Branch Chief  
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CNS Records