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SUBJECT: Requests relief from requirements of Section XI of ASME Code
 for IST of snubbers for third ten year testing interval.
 Approval to use 1995 OM Code for snubber testing requested.

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AEP:NRC:0969AT

June 14, 1996

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Donald C. Cook Nuclear Plant Units 1 and 2
REQUEST FOR ASME CODE RELIEF-SNUBBER TESTING

Gentlemen:

The purpose of this letter is to request relief from the requirements of Section XI of the ASME Code for the in-service testing of snubbers for the third ten year testing interval.

Per 10 CFR 50.55a(f)(4)(ii), the Donald C. Cook Nuclear Plant's third ten year in-service test interval must meet the requirements of the 1989 Code edition and addenda through 1988. The requirements for snubber testing are given in OMa-1988 edition of OM Part 4.

We are requesting approval to use the 1995 OM Code for snubber testing. The 1995 OM Code edition has a less restrictive inspection schedule than that given in OMa-1988 in that it incorporates the alternative inspection schedule recommended in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions". Generic Letter 90-09, which was the basis for unit 1 technical specification amendment 173 and unit 2 technical specification amendment 156, provided a visual inspection schedule that would reduce occupational radiation exposure and is highly cost effective.

The relief request, which is attached to this letter, is being submitted under the provisions of 10 CFR 50.55a(3)(i) as an alternative test that provides an acceptable level of quality and

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safety. We request approval of the attached relief request by November 30, 1996, so that it may be implemented during the Unit 1 refueling outage scheduled for January 1997.

Sincerely,

for W. E. Fitzpatrick
E. E. Fitzpatrick
Vice President

llg

Attachment

cc: A. A. Blind
G. Charnoff
H. J. Miller
NFEM Section Chief
NRC Resident Inspector - Bridgman
J. R. Padgett

bc: S. J. Brewer/D. H. Malin/R. G. Vasey
J. A. Kobyra/S. H. Steinhart/S. P. Hodge/D. R. Hafer
J. B. Shinnock
J. S. Wiebe
J. B. Hickman, NRC - Washington, D.C. - w/attachment
PRONET - w/attachment
DC-N-6015.1

Attachment to AEP:NRC:0969AT
Code Relief for Snubber In-Service Testing

SYSTEM/COMPONENT FOR WHICH RELIEF IS REQUESTED

Code relief is requested from performing examination and performance testing of nuclear power plant dynamic restraints (Snubbers) in accordance with ASME OM Code, Part 4, Version OMa-1988 during the third ten year interval. This is applicable for all snubbers (Grinell Hydraulic) in large and small bore piping except steam generator snubbers (McDowell Wellman).

CURRENT CODE REQUIREMENT

Per 10 CFR 50.55a(f)(4)(ii), the Donald C. Cook Nuclear Plant's third ten year in-service test interval must meet the requirements of the 1989 ASME Code edition and addenda through 1988. The requirements for snubber testing are given in OMa-1988 edition of OM Part 4.

PROPOSED ALTERNATE EXAMINATION

As an alternative we are proposing to use ASME OM Code 1995 Subsection ISTD, in lieu of ASME OMa-1988 Part 4, during the third ten year interval. This latest Code includes the recommendations of Generic Letter (GL) 90-09 and it is consistent with our current revised technical specifications (T/S's).

BASIS FOR RELIEF

Recognizing that the existing inspection schedule was excessively restrictive, the NRC staff developed GL 90-09 to provide an alternate schedule for visual inspection. The T/Ss for Cook Nuclear Plant units 1 and 2 have been revised to incorporate GL 90-09 inspection schedule recommendations. Therefore, adoption of ASME OM Code - 1995 for the snubber inspection schedule will provide an acceptable level of safety and quality, consistent with GL 90-09.

JUSTIFICATION

The proposed program, to use ASME OM Code 1995 for snubber inspection, complies with the inspection schedule requirements of GL 90-09. Adoption of this program will comply with our T/Ss, GL 90-09, and ASME OM Code 1995 - Subsection ISTD. Use of ASME OM Code 1995 Subsection ISTD in lieu of ASME/ANSI OMa-1998, will enable us to reduce occupational radiation exposure by as much as 50% due to the flexibility provided in the inspection schedule. The proposed program of ASME OM Code 1995 provides an acceptable level of quality and safety and will have no adverse impact on public health and safety.