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SUBJECT: Requests relief from requirements of section XI of ASME Code
for IST of SG snubbers for third ten yr testing interval.

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July 3, 1997

AEP:NRC:0969BC

Docket Nos.: 50-315
50-316

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

Gentlemen:

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

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 steam generator snubbers for the third ten year testing interval.

In accordance with 10 CFR 50.55a(f)(4)(ii), Cook Nuclear Plant's third ten year in-service test interval must meet the requirements of ASME section XI, 1989 edition. The requirements for snubber testing are given in ASME/ANSI OMA-1988, part 4.

We are requesting approval to use the 1995 OM code for steam generator 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 (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions". GL 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.

A similar request has been approved for large and small bore piping snubbers (AEP:NRC:0969AT, dated June 14, 1996). The steam generator snubbers were specifically excluded from the earlier relief request in anticipation of elimination by analysis. The analysis was not completed due to economic considerations.

The relief request, included as the attachment to this letter, is submitted under provisions of 10 CFR 50.55a(3)(i) as an alternative test that provides an acceptable level of quality and safety. We request approval of the relief request by September 15, 1997, so it

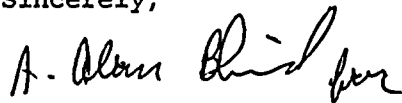
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may be implemented during the unit 2 refueling outage scheduled for September 1997.

Sincerely,



E. E. Fitzpatrick
Vice President

vlb

Attachment

c: A. A. Blind
 A. B. Beach
 MDEQ - DW & RPD
 NRC Resident Inspector
 J. R. Padgett

ATTACHMENT TO AEP:NRC:0969BC

REQUEST FOR ASME CODE RELIEF - SNUBBER 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 only for steam generator snubbers manufactured by McDowell-Wellman.

CURRENT CODE REQUIREMENT

Per 10 CFR 50.55a(f)(4)(ii), the Cook Nuclear Plant's third ten year in-service test interval must meet the requirements of the ASME code, 1989 edition. Section XI references ASME/ANSI OM, part 4, for snubbers. The 10 CFR 50.55a(b)(2)(viii) states, "the specified 'Revision date or Indicator' for ASME/ANSI OM Part 4...shall be the OMA-1988 Addenda to the OM-1987 Edition."

PROPOSED ALTERNATE EXAMINATION

As an alternative, we are proposing to use ASME OM code, 1995 edition, subsection ISTD, 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/Ss).

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. Pursuant to 10 CFR 50.55a(3)(i), relief should be granted since adoption of ASME OM code, 1995 edition, subsection ISTD for the scheduled steam generator snubber inspection will provide an acceptable level of safety and quality, consistent with GL 90-09.

JUSTIFICATION

The proposed program, to use ASME OM code, 1995 edition, subsection ISTD 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 edition, subsection ISTD. Use of ASME OM code, 1995 edition, subsection ISTD, 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 edition, subsection ISTD, provides an acceptable level of quality and safety, and will have no adverse impact on public health and safety.

