



Nebraska Public Power District

COOPER NUCLEAR STATION
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NLS970026

February 7, 1997

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

Gentlemen:

Subject: Third 10-Year Interval Inservice Inspection Program; Revision of PR-03
Cooper Nuclear Station, NRC Docket 50-298, DPR-46

References: See Attachment 2

On January 24, 1997, representatives of the Nebraska Public Power District (District) and the Nuclear Regulatory Commission (NRC) held a telephone conference regarding the wording contained in Relief Request PR-03. This relief request was submitted as part of the Third Ten-Year Interval Inservice Inspection Program for Cooper Nuclear Station (CNS). During this telephone conference, the District agreed to delete the paragraph (See Reference 1, PR-03, Page 10-7, first full paragraph) contained in the "Proposed Alternative Provisions" which allows for a second evaluation to justify deferral of bolt removal until the next time the affected component or applicable portion of the piping system is removed from service. Accordingly, PR-03 has been revised and is included in Attachment 1 to this letter for your review and approval as part of the larger review and approval of the Third Ten-Year ISI Program. Attachment 2 provides a list of major correspondence (references) related to the District's submittal and the NRC's review of the Third Ten-Year ISI Program. These references have been included for your information.

Please update your copy of the Third Ten-Year ISI Program document with the attached revised relief request (PR-03). Should you have any questions concerning the relief request revision, please contact me.

Sincerely,

P. D. Graham
Vice President - Nuclear

/dnm

Attachments

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NLS970026

February 7, 1997

Page 2 of 2

cc: Regional Administrator
USNRC - Region IV

Senior Project Manager
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector
USNRC

NPG Distribution

**Revised Pages associated with
Relief Request Number PR-03**

**“Alternative Corrective Measures
for Bolted Connections”**

RELIEF REQUEST NUMBER: PR-03, REVISION 1

COMPONENT IDENTIFICATION

Code Classes:	1, 2, and 3
References:	IWA-5250
Examination Categories:	B-P, C-H, and D-A
Item Numbers:	B15.10 through B15.71, C7.10 through C7.80, and D1.10
Description:	Alternate corrective measures for bolted connections.
Component Numbers:	All Class 1, 2, and Class 3 pressure retaining components subject to system pressure testing.

CODE REQUIREMENT

IWA-5250(a)(2) requires; if leakage occurs at a bolted connection, the bolting shall be removed, VT-3 visually examined for corrosion, and evaluated in accordance with IWA-3100.

BASIS FOR RELIEF

In the event of a bolted connection leak detected during the conduct of a system pressure test current ASME Section XI Code requirements specify that all bolting must be removed for the purpose of a VT-3 visual examination and evaluation. This would require placing the component or piping system out of service which could result in a plant shutdown, a delay of plant startup or, for continued operation, a reduction in plant safety. Additionally, removal of all bolting for examination serves no practicable purpose if the bolting is fabricated of a material which is not susceptible to corrosion due to contact with the leaking medium. The following proposed alternative provides an acceptable level of quality and safety equivalent to that provided by the applicable Code requirements.

PROPOSED ALTERNATE PROVISIONS

If leakage occurs at a bolted connection during the performance of a system pressure test, an engineering evaluation shall be performed to determine if the associated bolting is susceptible to corrosion which could result in further degradation and increased leakage. This evaluation shall address at a minimum:

- 1) type and location of leakage
- 2) historical leakage
- 3) bolting material and its resistance to corrosion by the leaking medium
- 4) visual evidence of corrosion
- 5) history of bolting material degradation due to corrosion in a similar environment

If the engineering evaluation indicates that the bolting material is not susceptible to corrosion, then bolt removal for visual examination and further evaluation shall not be required. However,

RELIEF REQUEST NUMBER: PR-03, REVISION 1

PROPOSED ALTERNATE PROVISIONS (continued.)

termination of leakage shall be addressed at the next available opportunity.

If the engineering evaluation determines the need for a visual examination of the bolting, one bolt closest to the source of leakage shall be removed, and in lieu of performing the Code required VT-3 visual examination the bolting will be VT-1 visually examined per IWA-2211(a) and evaluated in accordance IWB-3517.1. If the removed bolt has evidence of degradation, all remaining bolting shall be removed and VT-1 examined and evaluated accordingly. All examinations and evaluations shall be traceable to the VT-2 documentation originally detecting the leakage and applicable records will be maintained per IWA-6000.

APPLICABLE TIME PERIOD

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

List of Major District/NRC Correspondence associated with the Third Ten-Year ISI Program

- References:
1. Letter (No. NLS950157) to U.S. NRC Document Control Desk from J. H. Mueller (NPPD) dated October 18, 1995, "Third Ten-Year Interval Inservice Inspection Program"
 2. Letter to G. R. Horn (NPPD) from J. R. Hall (US NRC) dated February 8, 1996, "Cooper Nuclear Station - Request for Additional Information Regarding Third 10-Year Interval Inservice Inspection Program (TAC No. M94000)"
 3. Letter (No. NLS960050) to U.S. NRC Document Control Desk from J. H. Mueller (NPPD) dated April 11, 1996, "Response to Request for Additional Information and Submittal of Revision 1 to the Third Ten-Year Interval Inservice Inspection Program"
 4. Letter to G. R. Horn (NPPD) from D. L. Wigginton (USNRC) dated June 3, 1996, "Cooper Nuclear Station - Request for Additional Information Regarding Third 10-Year Interval Inservice Inspection Program (TAC No. M94000)"
 5. Letter (No. NLS960131) to U.S. NRC Document Control Desk from J. H. Mueller (NPPD) dated August 5, 1996, "Response to Request for Additional Information Regarding Revision 1 to the Third 10-Year Interval Inservice Inspection Program (TAC No. M94000) and Withdrawal of Request for Relief RI-23"

Correspondence No: NLS970026

The following table identifies those actions committed to by the District in this document. Any other actions discussed in the submittal represent intended or planned actions by the District. They are described to the NRC for the NRC's information 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.

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