

**From:** Wengert, Thomas  
**Sent:** Monday, January 10, 2022 3:45 PM  
**To:** Dewhirst, Linda R.  
**Cc:** Van Der Kamp, David W.; Forland, Thomas J.; Dixon-Herrity, Jennifer  
**Subject:** Cooper - Final RAI RE: Relief Request RR5-01 Revision 1 (EPID L-2021-LLR-0046)  
**Attachments:** Final RAI for Cooper Proposed Weld Overlay Alternative.pdf

On January 4, 2022, the U.S. Nuclear Regulatory Commission (NRC) staff sent Nebraska Public Power District (NPPD) the draft Request for Additional Information (RAI) identified below. This RAI relates to Relief Request RR5-01, Revision 1, dated June 21, 2021, concerning a potential proposed alternative dissimilar metal weld overlay repair for Cooper Nuclear Station.

On January 10, the NRC and NPPD staffs held a conference call to clarify the draft RAI. At the conclusion of the call, NPPD informed the NRC staff that the information requested was understood and that no additional clarification of the RAI was necessary. A publicly available version of this final RAI (attached, with "Draft" removed) will be placed in the NRC's Agencywide Documents Access and Management System (ADAMS). As agreed, please provide a response to this RAI within 30 days of this correspondence.

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**From:** Wengert, Thomas  
**Sent:** Tuesday, January 04, 2022 3:38 PM  
**To:** Dewhirst, Linda R. <lrdewhi@nppd.com>  
**Cc:** Van Der Kamp, David W. <dwvande@nppd.com>; Forland, Thomas J. <tjforla@nppd.com>; Dixon-Herrity, Jennifer <Jennifer.Dixon-Herrity@nrc.gov>  
**Subject:** Cooper - Draft RAI RE: Relief Request RR5-01 Revision 1 (EPID L-2021-LLR-0046)

By letter dated June 21, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21172A301), Nebraska Public Power District (the licensee) proposed an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI at Cooper Nuclear Station (Cooper). Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a, paragraph (z)(1), the licensee submitted Relief Request RR5-01, Revision 1, proposing an alternative dissimilar metal weld overlay repair on the basis that the proposed alternative provides an acceptable level of quality and safety.

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the submittal and determined that additional information, as described in the attached request for additional information (RAI), is required for the staff to complete its review of this application. This RAI is identified as draft at this time to confirm your understanding of the information that the NRC staff needs to complete the evaluation. If the request for information is understood, please respond to this RAI within 30 days of the date of this request.

Please contact me if you would like to set up a conference call with the NRC staff to clarify this draft RAI.

Tom Wengert  
Project Manager – Cooper Nuclear Station  
NRR/DORL/LPL4  
(301) 415-4037

**Hearing Identifier:** NRR\_DRMA  
**Email Number:** 1481

**Mail Envelope Properties** (MN2PR09MB5449C61527352D6F52BA310C8F509)

**Subject:** Cooper - Final RAI RE: Relief Request RR5-01 Revision 1 (EPID L-2021-LLR-0046)  
**Sent Date:** 1/10/2022 3:44:44 PM  
**Received Date:** 1/10/2022 3:44:00 PM  
**From:** Wengert, Thomas

**Created By:** Thomas.Wengert@nrc.gov

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Tracking Status: None  
"Forland, Thomas J." <tjforla@nppd.com>  
Tracking Status: None  
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Tracking Status: None  
"Dewhirst, Linda R." <lrdewhi@nppd.com>  
Tracking Status: None

**Post Office:** MN2PR09MB5449.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	2616	1/10/2022 3:44:00 PM
Final RAI for Cooper Proposed Weld Overlay Alternative.pdf		139718

**Options**  
**Priority:** Normal  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**

REQUEST FOR ADDITIONAL INFORMATION

RELIEF REQUEST NO. RR5-01, REVISION 1

ALTERNATIVE FOR DISSIMILAR METAL WELD OVERLAY REPAIR

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

DOCKET NO. 50-298

By letter dated June 21, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21172A301), Nebraska Public Power District (the licensee) proposed an alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI at Cooper Nuclear Station (Cooper). Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a, paragraph (z)(1), the licensee submitted Relief Request RR5-01, Revision 1, proposing an alternative dissimilar metal weld overlay repair on the basis that the proposed alternative provides an acceptable level of quality and safety.

To complete its review, the U.S. Nuclear Regulatory Commission (NRC) staff requests the following additional information.

**Regulatory Basis**

The inservice inspection (ISI) of ASME Code Class 1, 2, and 3 components is to be performed in accordance with Section XI of the ASME Code and applicable edition and addenda as required by 10 CFR 50.55a(g), "Preservice and inservice inspection requirements," except where specific relief has been granted by the NRC pursuant to 10 CFR 50.55a(g)(6)(i), "Impractical ISI requirements: Granting of relief."

Pursuant to 10 CFR 50.55a(z), "Alternatives to codes and standards requirements," alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC if: (1) the proposed alternatives would provide an acceptable level of quality and safety, or (2) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The licensee submitted the request pursuant to 10 CFR 50.55a(z)(1), on the basis that the proposed alternative would provide an acceptable level of quality and safety.

**Request for Additional Information (RAI)**

RAI-NPHP-01

The licensee's application states that the full structural weld overlay will be designed consistent with the requirements for the design thickness, length, and location of the overlay in accordance with Nonmandatory Appendix Q, "Weld Overlay Repair of Class 1, 2, and 3 Austenitic Stainless Steel Piping Weldments," and IWB-3640 of ASME Code, Section XI, 2007 Edition through the 2008 Addenda, as referenced by Nonmandatory Appendix Q. In the event that an overlay

repair is required, identify when the design analysis will be completed and available for NRC staff inspection/audit.

RAI-NPHP-02

The licensee's application does not provide any discussion regarding the growth of a flaw found in the dissimilar metal weld. Explain how the potential for flaw growth in the original dissimilar metal weld will be evaluated to demonstrate the adequacy of the weld overlay design.

RAI-NPHP-03

Confirm whether the licensee intends to submit acceptance examination and preservice inspection results to the NRC, or make them available for NRC staff inspection, after installation of the weld overlay and before the restart of the plant. This is to confirm that the weld overlay installation has satisfied the proposed alternative.