

September 14, 2001

MEMORANDUM TO: File

FROM: Jack N. Donohew, Senior Project Manager, Section 2 **/RA/**
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: INFORMATION NEEDED TO CLARIFY LICENSEE'S RELIEF
REQUEST AL-02 SUBMITTED JULY 24, 2001 - CALLAWAY
PLANT, UNIT 1 (TAC NO. MB2547)

Attached is an e-mail dated August 30, 2001, from the technical branch reviewing the licensee's (Union Electric Company's) Relief Request AL-02, which was submitted by letter dated July 24, 2001 (ULNRC-04502). The e-mail requested information from the licensee to clarify the licensee's letter requesting the relief from 10 CFR 50.55a. The attachment to the e-mail provides the reviewers interpretation of the licensee's request. The email was sent to the licensee on August 30, 2001.

The purpose of staff's statement and questions in the attached e-mail is to clarify the license's letter.

Docket No. 50-483

Attachment: Email Dated August 30, 2001

MEMORANDUM TO: File

September 14, 2001

FROM: Jack N. Donohew, Senior Project Manager, Section 2 **/RA/**
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: INFORMATION NEEDED TO CLARIFY LICENSEE'S RELIEF
REQUEST AL-02 SUBMITTED ON JULY 24, 2001 - CALLAWAY
PLANT, UNIT 1 (TAC NO. MB2547)

Attached is an e-mail dated August 30, 2001, from the technical branch reviewing the licensee's (Union Electric Company's) Relief Request AL-02, which was submitted by letter dated July 24, 2001 (ULNRC-04502). The e-mail requested information from the licensee to clarify the licensee's letter requesting the relief from 10 CFR 50.55a. The attachment to the e-mail provides the reviewers interpretation of the licensee's request. The email was sent to the licensee on August 30, 2001.

The purpose of staff's statement and questions in the attached e-mail is to clarify the license's letter.

Docket No. 50-483

Attachment: Email Dated August 30, 2001

DISTRIBUTION:

PDIV-2R/F
PUBLIC
JDonohew
FGrubelich
EPeyton

ACCESSION NO.: ML012600217

NRR-106

OFFICE	PDIV-2/PM	PDIV-2/LA	PDIV-2/SC
NAME	JDonohew	EPeyton	SDembek
DATE	9/14/2001	9/14/01	9/14/01

C:\Program Files\Adobe\Acrobat 4.0\PDF Output\MemoToDocketFile-4.cw.wpd

OFFICIAL RECORD COPY

EMAIL DATED AUGUST 30, 2001

From: Frank Grubelich
To: Jnd
Date: 8/30/01 9:09AM
Subject: [Callaway] Relief Request [AL-02]

Jack,

The attached file contains the information we discussed today about the need for clarification of the alternative proposed in the subject request with regard to using the mechanical exerciser for inservice testing of check valves.

CC: David Terao

CALLAWAY RELIEF REQUEST AL-O2

LICENSEE'S PROPOSED ALTERNATIVE

“Exercise check valve (full stroke) to open position using mechanical exerciser while adhering to the 1989 ASME Section XI acceptance criteria. The full stroke open test torque acceptance criteria will be a percentage of the calculated opening torque available due to system differential pressure while the system is in service.”

The 1989 ASME Section XI Code requirements, contained in ASME/ANSI, OMa-1988, Part 10, paragraph ISTC 4.5.4(b), for exercising check valves by the use of a mechanical exerciser, consists of the following two interrelated parts;

- The 1989 ASME Section XI acceptance criteria requires that when a mechanical exerciser is used to move the obturator, the force or torque required to move the obturator shall not vary by more than 50%(+/- 50%) from the established reference value; and
- The 1989 ASME Section XI requires that the reference value be determined from the results of testing, and the testing shall be performed under conditions as near as those expected during inservice testing when the valve is known to be operating acceptably.

The reviewer's interpretation of the intent of the licensee's alternative is;

When using a mechanical exerciser to exercise the check valve (full stroke) to the open position, the measured force will not vary by more than 50% from the established reference value, and that the reference value will be determined by taking a percentage of the calculated valve opening torque or force available due to system differential pressure while the system is in service.

If the intent of the licensee's alternative is consistent with the reviewer's interpretation, than the alternative could be considered viable, provided;

- The reference value derived from calculated available torque or force should consider the minimum system flow condition under which the valve is required to operate, and
- The percentage of the calculated available torque or force used to establish the reference value should provide a reasonable margin of valve's functional capability over the forces resisting disc movement.

The licensee should confirm that the reviewer's interpretation and the intent of the proposed alternative are consistent, otherwise, clarify the intent of the proposed alternative with regard to adhering to the 1989 ASME Section XI acceptance criteria of not varying by more that 50% from the established reference value, use of an established reference value, and the meaning of the words in the second sentence that state, “the acceptance criteria will be a percentage of the calculated opening torque available due to system differential pressure while the system is in service.”