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October 4, 2001

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555-0001

Gentlemen:

ULNRC-04534

**DOCKET NUMBER 50-483
UNION ELECTRIC COMPANY
CALLAWAY PLANT
CALLAWAY PUMP AND VALVE INSERVICE TESTING PROGRAM:
REVISION OF PREVIOUSLY SUBMITTED RELIEF REQUEST**



By letter dated July 24, 2001 (Letter ULNRC-04502), Union Electric Company (AmerenUE) submitted to the NRC the latest revision of the Callaway Pump and Valve Inservice Testing Program. Included in the letter was a request for relief regarding the stroke testing of certain check valves having mechanical exercisers. Specifically, Relief Request AL-02 was submitted to permit the use of acceptance criteria based on a later Edition of Section XI of the American Society of Mechanical Engineers (ASME) code, i.e., ASME OM Code – 1998, in lieu of the Edition to which Callaway is currently committed, i.e., the 1989 Edition.

Subsequent to the July 24 submittal, and based on a telephone discussion between AmerenUE and NRC personnel on September 18, 2001, AmerenUE determined that a minor revision of AL-02 should be made to clarify the applicable Code requirement for establishing the test acceptance criteria for the affected valves. The revision also removes unnecessary or potentially confusing wording regarding how the acceptance criteria are to be established, in light of the fact that the applicable Code requirement provides adequate guidance for establishing the acceptance criteria.

The revised relief request is hereby provided as an attachment to this letter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "David Shifer".

for John D. Blosser
Manager-Regulatory Affairs

TBE/jdg

Attachments: Relief Request AL-02 (Revised)

A047

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**Relief Request AL-02
(Revised)**

AL-02

RELIEF REQUEST

VALVE: ALV0001, V0002, V0003, V0006, V0009, V0012, V0015,

CATEGORY: C

CLASS: 3

FUNCTION: Open on flow from either the Condensate Storage Tank or Essential Service Water to the Auxiliary Feedwater Pumps to provide flow to the Steam Generators.

TEST REQUIREMENT: Exercise check valve (full stroke) to the position required to fulfill its function every 3 months.

BASIC FOR RELIEF: These valves possess mechanical exercisers and consequently are exercised to the full open position quarterly by measuring the breakaway torque. The acceptance criterion per ASME Section XI 1989 Edition (to which Callaway is committed) is that the breakaway torque "shall not vary by more than 50% from the established reference value." This acceptance criterion, however, has proven to be too stringent. Test acceptance criteria based on this criterion are spuriously exceeded, but no degradation has been detected with these valves when investigating the acceptance criteria violations. The breakaway torque variations exceed the acceptance criteria due to fluctuations in valve variables (i.e., changes in packing friction and disk seating effectiveness).

ALTERNATE TESTING: Exercise check valve (full stroke) to the open position using mechanical exerciser while adhering to ASME OM Code - 1998, paragraph ISTC-5221 (b).