

August 5, 2002

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555-0001

Ladies and Gentlemen:

ULNRC-04705



**DOCKET NUMBER 50-483
CALLAWAY PLANT
UNION ELECTRIC COMPANY
REVISION TO TECHNICAL SPECIFICATION 5.5.9
"STEAM GENERATOR (SG) TUBE SURVEILLANCE PROGRAM"**

References: 1) ULNRC-4391, dated February 15, 2001
2) ULNRC-04558, dated November 7, 2001
3) ULNRC-04617, dated March 1, 2002

Reference 1 transmitted a License Amendment Request (LAR) to revise Technical Specification 5.5.9 to remove the two cycle operating limit and allow all steam generator tubes repaired with Electrosleeves to remain in service. References 2 and 3 provided additional information based on questions from the NRC Staff.

A telecon was held on July 25th, 2002 with AmerenUE and the NRC Staff to discuss establishing a time-based tube pull program as a stipulation of granting the amendment request. As previously stated in Reference 1's response to RAI Question # 6, AmerenUE plans to replace the current steam generators in October 2005 (Refuel 14), therefore no time-based tube pull program would be implemented. As discussed with the staff on the July 25th, 2002 telecon, if for some reason the steam generators containing the Electrosleeved tubes were not replaced in Refuel 14, AmerenUE will either plug the Electrosleeved tubes or implement a time-based tube pull program which has been approved by the NRC.

The purpose of this letter is to request that you condition the license amendment as agreed upon in our telecon with the staff. We propose the following be added as a condition to the amendment: "Upon implementation of this amendment, if for any reason the current steam generators are not replaced in Refuel 14, the licensee will plug all of the Electrosleeved tubes or implement a time-based tube pull program which has been approved by the NRC."

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It has been determined that these additional changes are bounded by the significant hazards consideration submitted in Reference 1 and therefore do not involve a significant hazards consideration as determined by 10 CFR 50.92, and also an environmental assessment need not be prepared pursuant to 10 CFR 51.22(b).

AmerenUE would like to request an implementation date of within 60 days of issuance of the amendment.

If you have any questions on this subject, please contact Mr. Dave Shafer at (314) 554-3104.

Very truly yours,

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

John Blosser
Manager, Regulatory Affairs

JMC/

bcc: Phyllis Murdock/A160.761
/QA Record (CA-758)

E210.01

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