

November 13, 2002

Mr. Garry L. Randolph
Vice President and Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 - RESPONSE TO NRC BULLETIN 2002-02,
"REACTOR PRESSURE VESSEL HEAD AND VESSEL HEAD PENETRATION
NOZZLE INSPECTION PROGRAMS" (TAC NO. MB5878)

Dear Mr. Randolph:

On August 9, 2002, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs." The Bulletin requested addressees to provide information related to their reactor pressure vessel (RPV) head and vessel head penetration (VHP) nozzle inspection programs for their respective facilities, including a summary discussion of inspection program plans to supplement their required visual inspections with non-visual nondestructive examination methods, or justification for reliance on visual examinations as the primary method to detect degradation. Addressees were requested to respond to Item 1 of the Bulletin within 30 days of its issuance, or within 15 days of its issuance, to provide an alternative course of action, including the basis for acceptability of the proposed action.

By letter dated September 11, 2002 (ULNRC-04731), you provided a response to Item 1 of the Bulletin, providing your plans to perform RPV head and VHP nozzle inspections at the Callaway Plant. The response also indicated that the plant is in the category of plants considered to have low susceptibility to RPV head and VHP cracking, based on a susceptibility ranking of less than 8 effective degradation years (EDY). Specifically, you stated that Callaway had approximately 2.5 EDY, in accordance with the Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) Report MRP-48.

The NRC staff has reviewed your response to Item 1 of the Bulletin. In that response, you stated that your immediate inspection plan is to perform a 100% bare metal visual examination of the RPV head (i.e., 100% of the carbon steel surface and 100% of the interface area between the head penetrations and the carbon steel on top of the head) during refueling outage No. 12. The staff finds that this inspection plan is adequate for providing reasonable assurance that existing regulatory requirements are met.

The staff notes that your justification for reliance on visual examinations and long-term inspection plans relies on the EPRI MRP inspection plan for pressurized water reactor RPV upper head penetrations. The staff has not completed its review of the MRP inspection plan and, as such, has not made a determination on the adequacy of the program for ensuring applicable regulatory requirements are met. Therefore, the staff's assessment of your justification and the adequacy of your long-term inspection program plans will be determined upon completion of the staff's review of the MRP proposed inspection plan.

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Also, as stated in Item 2 of the Bulletin, you are requested to report to the Commission your inspection scope and results within 30 days after plant restart following the inspection of the RPV head and VHP nozzles.

If you have any questions on this issue or this letter, contact me at (301) 415-1307.

Sincerely,

/RA/

Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: See next page

Mr. Garry L. Randolph

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