

July 6, 2004

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

Ladies and Gentlemen:

ULNRC-05024



**CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
DOCKET NUMBER 50-483
REQUEST FOR RELIEF FOR THE CALLAWAY PLANT
INSERVICE INSPECTION PROGRAM PLANT**

Pursuant to 10 CFR 50.55a(a)(3)(ii), Callaway hereby requests NRC approval of the following request for the 2nd 10 Year Interval Inservice Inspection Program: permission to extend the current interval to accommodate the replacement steam generator project. The details of the 10 CFR 50.55a request are enclosed.

This letter and the following relief request have been prepared following the format outlined in the Nuclear Energy Institute white paper dated October 15, 2002, "Standard Format for Requests Pursuant to 10 CFR 50.55a".

If you have any questions or require additional information, please contact Dave Shafer at (314) 554-3104 or Dwyla Walker at (314) 554-2126.

Sincerely,

A handwritten signature in black ink that reads "Keith D. Young".

Keith D. Young
Manager, Regulatory Affairs

DJW/jdg

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cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)
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10 CFR 50.55a Request Number ISI-32

Proposed Alternative
In Accordance with 10 CFR 50.55a(a)(3)(ii)

**-Hardship or Unusual Difficulty without Compensating
Increase in Level of Quality or Safety-**

1. ASME Code Component(s) Affected

Components inspected under Inservice Inspection Program Plan in Accordance with American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, Subsections IWA, IWB, IWC, IWD, and IWF, for Inspection Program B.

Note that this request does not address the containment liner and concrete inspection and testing program requirements of IWE and IWL.

2. Applicable Code Edition and Addenda

ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition, no Addenda.

3. Applicable Code Requirement

ASME Boiler and Pressure Vessel Code, Section XI, Subparagraph IWA-2430(d) states that "For components inspected under Program B, each of the inspection intervals may be extended or decreased by as much as 1 year. Adjustments shall not cause successive intervals to be altered by more than 1 year from the original pattern of intervals."

Callaway Plant's second Inservice Interval is currently scheduled to end December 18, 2004. The 1 year extension allowance would allow Callaway Plant to extend the interval to December 18, 2005 without seeking relief.

4. Reason for Request

Callaway Plant is preparing to replace all four steam generators during Refuel 14 (Fall 2005). The steam generators are being fabricated and installed to the 1989 Edition of ASME in accordance with Callaway's Current Repair and Replacement program and Inservice Inspection Program.

Because of the magnitude and complexity of such a project and in order to ensure that all applicable code requirements are clearly understood, it is desirable to close out the project without a change in applicable Code Edition and Addenda. Installation activities may not be completed by the end of the interval, including the 12 month extensional allowed by IWA-2430(d). Due to the magnitude of this project, Callaway believes it is prudent to request relief to extend the interval until breaker closure of Refuel 14 (which is currently

scheduled to begin Fall, 2005) or 90 days beyond December 18, 2005, whichever comes later, in the event that complications arise which result in an extended refueling outage.

5. Proposed Alternative and Basis for Use

Callaway requests permission to extend the second Inservice Inspection Interval to the date of breaker closure following Callaway Refuel 14 (which is currently scheduled to begin Fall, 2005) or 90 days beyond December 18, 2005, whichever comes later.

6. Duration of Proposed Alternative

Until breaker closure following Callaway Refuel 14 or 90 days beyond December 18, 2005 which ever comes later.

7. Precedents

Oyster Creek Generating Station – ISI Code Request No. 27

8. References

American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, 1989 Edition, no Addenda