

July 2, 2004

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

Ladies and Gentlemen:

ULNRC-05021



**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
APPLICATION OF PROPRIETARY
LEAK-BEFORE-BREAK (LBB) METHODOLOGY
REPORTS AND DRAFT REGULATORY GUIDE DG-1108**

- References:
1. ULNRC-04868 dated June 27, 2003
 2. ULNRC-04926 dated December 9, 2003
 3. ULNRC-04939 dated January 14, 2004
 4. ULNRC-04974 dated April 5, 2004
 5. Callaway Amendment 161 dated 4/12/04

In Reference 1 above, AmerenUE transmitted an application for amendment to Facility Operating License Number NPF-30 for Callaway Plant. References 2 through 4 provided the responses to several NRC requests for additional information. Callaway License Amendment 161 was issued in Reference 5.

License Amendment 161 did not approve the use of the American Society of Civil Engineers (ASCE) Standard 4-86 "100-40-40" equation for seismic load combination nor the application of the leak-before-break (LBB) methodology in WCAP-15983-P Revision 0 for the pressurizer surge line.

Since we have determined that the ASCE 4-86 "100-40-40" equation is not needed, AmerenUE withdraws our request for approval to apply that ASCE 4-86 methodology at Callaway Plant.

AmerenUE will submit additional information regarding effective mitigation measures to be applied at the Alloy 82/182 pressurizer nozzle safe end weld at the base of the pressurizer prior to November 30, 2004. A description of the mitigation measures and a commitment to apply those measures at this weld will allow us to

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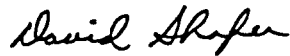
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pursue the application of LBB for the entire pressurizer surge line and approval of WCAP-15983 to support modifications related to the replacement steam generators to be installed during Refuel 14 (fall 2005).

Sincerely,



for

Keith D. Young
Manager, Regulatory Affairs

DES/jdg

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