

April 27, 2005

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

Ladies and Gentlemen:

ULNRC-05143

**DOCKET NUMBER 50-483  
UNION ELECTRIC COMPANY  
CALLAWAY PLANT  
REQUEST TO APPLY SUBSEQUENT  
ASME SECTION XI CODE EDITION AND ADDENDA  
FOR SITE REPAIR/REPLACEMENT PROGRAM**

References: (1) NRC Regulatory Issue Summary (RIS) 2004-16,  
"Use of Later Editions and Addenda to ASME Code  
Section XI for Repair/Replacement Activities,"  
dated October 19, 2004


Per current Code commitments for the Callaway plant, ASME Section XI 1998 Edition through the 2000 Addenda is applicable to Callaway's Third Inspection Interval Repair/Replacement Plan. Pursuant to 10CFR50.55a(g)(4)(iv) however, and as clarified by RIS 2004-16 dated October 19, 2004, Union Electric (AmerenUE) hereby requests NRC approval to apply the following portion of a subsequent ASME Section XI Code Edition and Addenda to Callaway's Third Inspection Interval Repair/Replacement Program:

ASME Section XI, 2001 Edition, Subsubarticle IWA-4520, EXAMINATION,  
Subparagraphs (a) and (b).

The details of this 10 CFR 50.55a request are provided in Attachment 1.

Please note that AmerenUE requests approval of this request by November 1, 2005 in order to support implementation of the Repair/Replacement Program for the Third Inspection Interval.

Very truly yours,

*for*   
Keith D. Young  
Manager - Regulatory Affairs

JEO/TBE/jdg

Attachment

AD47



ULNRC-05143

April 27, 2005

Page 2

cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)  
Attn: Document Control Desk  
Mail Stop P1-137  
Washington, DC 20555-0001

Mr. Bruce S. Mallett  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011-4005

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Mr. Jack N. Donohew (2 copies)  
Licensing Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop 7E1  
Washington, DC 20555-2738

Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
PO Box 360  
Jefferson City, MO 65102-0360

**Proposed Use of Subsequent ASME Code Edition and Addenda  
In Accordance with 10 CFR 50.55a (g)(4)(iv) for Repair/Replacement Activities.**

AmerenUE hereby requests approval to apply those portions of ASME Section XI identified in Section 3.0 below for Repair/ Replacement Activities at Callaway during the plant's Third Inspection Interval.

- 1.0 ASME Code Component(s) Affected  
ASME Section III Class 1, 2 and 3 items.
- 2.0 Applicable Code Edition and Addenda  
ASME Section XI, 1998 Edition through 2000 Addenda, approved by the NRC in 10 CFR 50.55a(b)(2) as of December 19, 2003, is applicable to the Third Inspection Interval Repair/Replacement Program for the Callaway Nuclear Plant. Regulatory Guide 1.147, Revision 13, is also applicable.
- 3.0 Proposed Portion of Subsequent Code Edition and Addenda  
ASME Section XI, 2001 Edition, Subsubarticle IWA-4520, EXAMINATION, Subparagraphs (a) and (b) shall apply. This Code edition has been incorporated into the regulations by reference, as published for notice in the Federal Register on October 1, 2004 (69 FR 58804, "Final Rule"), and which became effective November 1, 2004.
- 4.0 Related Requirements  
Subsubarticle IWA-4520, Subparagraph (c) is not approved for use per paragraph b(2)(xix) of 10CFR50.55a, *Substitution of alternative methods*, and is therefore excluded from this request. All other related requirements are consistent with the Code edition and addenda identified in Section 2.0 above.
- 5.0 Duration of Proposed Request  
The duration of applicability for the proposed request is through the Third Inspection Interval for Callaway, which ends December 18, 2014.