

September 15, 2008

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

ULNRC-05542



Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
FACILITY OPERATING LICENSE NPF-30  
ADDITIONAL INFORMATION REGARDING 10CFR50.55a REQUEST:  
PROPOSED ALTERNATIVE TO ASME SECTION XI REQUIREMENTS  
FOR REPLACEMENT OF CLASS 3 BURIED PIPING – (TAC NO. MD6792)**

- References:
1. ULNRC-05434 dated August 30, 2007
  2. ULNRC-05490 dated April 17, 2008
  3. ULNRC-05517 dated July 10, 2008
  4. ULNRC-05529 dated July 24, 2008

By letter dated August 30, 2007 (Reference 1 above), Union Electric Company (AmerenUE) submitted Relief Request I3R-10 regarding paragraph IWA-4221(b) of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI. The relief request, which is still under review by the NRC staff, was submitted to support the planned replacement of buried steel piping in Callaway's essential service water (ESW) system with high-density polyethylene (HDPE) piping. Subsequent to submittal of the relief request, additional letters (identified as References 2, 3 and 4 above) were submitted to provide additional or clarifying information requested by the NRC staff in regard to the request.

The additional information provided by AmerenUE included two calculations. Specifically, in the letter of Reference 2 above, AmerenUE provided (as Enclosure 3 of that letter) a preliminary stress analysis for the new ESW piping configuration, i.e., Calculation 2007-16760, "Analysis of Buried HDPE ESW Piping." In the letter of Reference 3 above, AmerenUE provided (as Enclosure 4 to that letter) Calculation 2007-13241, "Minimum Wall Thickness for ESW Buried HDPE Piping," Revision 0.

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