



Callaway Plant

March 19, 2014

ULNRC-06092

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

10 CFR 50.55a

Ladies and Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
FACILITY OPERATING LICENSE NPF-30  
RELIEF REQUEST I3R-16 FOR TEMPORARY NON-CODE REPAIR OF  
THE TRAIN A COMPONENT COOLING WATER HEAT EXCHANGER**

Pursuant to 10 CFR 50.55a(a)(3)(ii), Union Electric Company (Ameren Missouri) hereby requests NRC approval of the attached relief request I3R-16. The requested relief is intended for the third 10-year inservice inspection interval of Callaway's Inservice Inspection (ISI) Program. With regard to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, i.e., Section XI, "Rules and Inservice Inspection of Nuclear Power Plant Components," the Code Edition and Addenda applicable to Callaway's third 10-year ISI interval is the 1998 Edition with 2000 Addenda.

Per the attached relief request, Ameren Missouri proposes to implement alternative requirements in lieu of requirements contained in ASME Section XI IWA-4000, "Repair/Replacement Activities," subject to the NRC staff interpretation provided in Appendix C.12 of Inspection Manual Chapter (IMC) 0326, "Operability Determinations & Functionality Assessments for Conditions Adverse to Quality or Safety," regarding through-wall conditions in Class 3 components. The scope of the request is limited to the train A Component Cooling Water Heat Exchanger (EEG01A), which has developed a pinhole through-wall defect that has resulted in leakage of essential service water (ESW) from the component.

A mid-cycle shutdown to restore the affected component to its design condition in accordance with IWA-4000 would represent a hardship or unusual difficulty without a compensating increase in level of quality or safety. In lieu of the IWA-4000 requirements, Ameren Missouri proposes to apply provisions of IWA-4133, "Mechanical Clamping Devices used as Piping Pressure Boundary," and Mandatory Appendix IX, "Mechanical Clamping Devices for Class 2 and 3 Piping Pressure Boundaries," for installation of a temporary non-code repair to control ESW leakage.

Installation of the mechanical clamping device to provide a credited pressure boundary in the area of the flaw will allow recovery of available margin of stored water volume in the ultimate heat sink (UHS) that exceeds the volume credited in safety analyses.

In accordance with ASME Code Case N-705, which has been accepted by the NRC and incorporated into Revision 16 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Ameren Missouri has performed an evaluation that determined adequate structural integrity of the affected component will be maintained with or without the mechanical clamping device being installed.

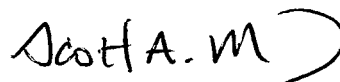
To satisfy the requirements of ASME Code Case N-705, Mandatory Appendix IX and NRC Inspection Manual Chapter 0326 Appendix C.12, a permanent internal weld repair that will restore the affected component to full compliance with IWA-4000 is scheduled to be performed in the next refueling outage for Callaway, i.e., Refuel 20, which is scheduled to begin in October 2014. Installation of the mechanical clamping device is planned for the week of March 24, 2014. Please be advised, therefore, that Ameren Missouri expects to promptly request verbal approval of the enclosed relief request following submittal of this written request (i.e., prior to March 21, 2014.)

Supporting information and essential details, including justification, is provided in the attached relief request.

This letter does not contain new commitments.

If there are any questions, please contact J. A. Doughty at 573-220-5145.

Sincerely,

A handwritten signature in black ink that reads "Scott A. M" followed by a large, stylized loop.

Scott A. Maglio,  
Manager, Regulatory Affairs

JPK/

Enclosure:

1. 10 CFR 50.55a Request Number I3R-16
2. Attachment A: CAR 2012307879 – A CCW HX Pinhole Leak Evaluation
3. Attachment B: Engineering Disposition - EEG01A Temporary Non-Code Leak Repair

ULNRC-06092  
March 19, 2014  
Page 3

cc: Mr. Marc L. Dapas  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

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

Mr. Fred Lyon  
Project Manager, Callaway Plant  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Mail Stop O-8B1  
Washington, DC 20555-2738

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