

October 6, 2015

ULNRC-06256

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.
RENEWED FACILITY OPERATING LICENSE NPF-30
SUPPLEMENT TO REQUEST I4R-02 FOR RELIEF FROM
REQUIREMENTS OF ASME SECTION XI, TABLE IWF-2500-1
FOR 100% VISUAL EXAMINATION OF CLASS 1 SUPPORTS,
TAC NO. MF5613**

Reference:

1. ULNRC-06176, "Request I4R-02 for Relief from Requirements of ASME Section XI, Table IWF-2500-1 for 100% Visual Examination of Class 1 Supports," dated January 26, 2015 (ADAMS Accession No. ML15026A686)

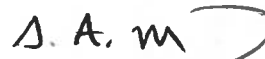
Reference 1 transmitted a request for relief from the requirements of ASME Section XI, Table IWF-2500-1, Category F-A, Item Number F1.40, to perform a 100% visual examination of the Reactor Pressure Vessel supports, on the basis that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety. The requested relief is intended for the fourth 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 fourth 10-year ISI interval is the 2007 Edition through 2008 Addenda. Supporting information and essential details for the requested Code relief, including proposed alternative and basis for use, were provided in Relief Request I4R-02 attached to the Reference 1 letter.

After submittal of Reference 1 and attached Relief Request I4R-02, it was found that that these documents had incorrectly cited 10 CFR 50.55a(a)(3)(ii), which was superseded by 10 CFR 50.55a(z)(2), as the regulatory basis for requesting relief.

Thus, to be clear, pursuant to 10 CFR 50.55a(z)(2), Ameren Missouri is requesting relief from the requirements of ASME Section XI, Table IWF-2500-1, Category F-A, Item Number F1.40, to perform a 100% visual examination of the Reactor Pressure Vessel supports, on the basis that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety. A change page to correct previously submitted Relief Request I4R-02 is attached.

This letter does not contain new commitments. If there are any questions, please contact J. P. Kovar at 314-225-1478.

Sincerely,

Handwritten signature of S. A. Maglio in black ink.

S. A. Maglio,
Manager, Regulatory Affairs

JPK

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**Attachment to
ULNRC-06256**

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1 Page

10 CFR 50.55a Request Number I4R-02

Proposed Alternative In Accordance with 10 CFR 50.55a(z)(2)

Hardship or Unusual Difficulty Without a Compensating Increase in the Level of Quality or Safety

1. ASME Code Components Affected

Reactor Vessel Supports, Component Numbers 2-RBB01-01, 2-RBB01-02, 2-RBB01-03 and 2-RBB01-04

2. Applicable Code Edition and Addenda

ASME Boiler and Pressure Vessel Code, Section XI, 2007 Edition through 2008 Addenda

3. Applicable Code Requirement

Relief is requested from the requirements of ASME Section XI, Table IWF-2500-1, Category F-A, Item Number F1.40 which requires that 100% of Class 1 supports, other than piping supports, be subject to a visual, VT-3 examination once every inspection interval.

4. Reason for Request

Pursuant to 10 CFR 50.55a(z)(2), relief is requested on the basis that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety. Conformance with the applicable inservice inspection requirements would necessitate a design modification to the Reactor Pressure Vessel (RPV) supports and associated insulation/walk-plate to allow 100% visual examination of the subject supports.

In addition, limited accessibility and high radiation levels in the area where these supports are located further reduces the percentage of the supports available for visual examination.

The Callaway RPV is supported by two cold leg nozzles and two hot leg nozzles. There is a support assembly at each of these nozzles that consists of a nozzle weld build-up, shoe plate, air cooled box, and steel support structure embedded in the primary shield wall. Figures 1 and 2 depict these support assemblies. As shown in the Figures, only the nozzle weld build-up and shoe plate are completely accessible for a visual VT-3 examination. Most of the air cooled box and the entire steel support structure are located beneath a steel walk-plate, and only the top of the air cooled box is directly accessible. An additional 20 to 30 percent of the air cooled box and a very small percentage of the steel support structure would be made accessible if the steel walk plate and insulation were removed.