

**From:** [Klos, John](#)  
**To:** ["Telwood@ameren.com"](mailto:Telwood@ameren.com)  
**Cc:** [Klos, John](#)  
**Subject:** Request for Additional Information Relief Request Impractical In-Service Inspection MF6736,  
**Date:** Thursday, November 12, 2015 8:19:45 AM  
**Importance:** High

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Mr. Elwood,

By letter dated September 14, 2015, Agencywide Documents and Access and Management System (ADAMS) Accession Number ML15258A432 Ameren Missouri submitted a relief request for Callaway Unit 1 concerning weld examinations performed during the third Inservice Inspection Program interval.

The Nuclear Regulatory Commission staff has reviewed the submittal and determined that a request for additional information (RAI) is needed to complete its review. The draft question was sent via electronic transmission on Nov 3, 2015 but no clarification call was requested by the licensee. The following RAI is now submitted to licensee and a response is requested in 29 days from the date of this email by Friday December 11, 2015. The RAI is as follows;

## 1.0 SCOPE

By letter dated September 14, 2015 (Agencywide Documents Access and Management System (ADAMS) at Accession Number ML15258A432), Union Electric Company (dba Ameren Missouri), the licensee, requested relief from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME BPV Code), Section XI, for Callaway Plant, Unit 1 (Callaway) under the provisions of Title 10 of the Code of Federal Regulations (10 CFR), Part 50, Section 50.55a(g)(5)(iii), for the third 10-year inservice inspection (ISI) Program. Request for Relief (RR) No. I3R-11 applies to the third 10-year ISI interval, in which the licensee adopted the 1998 Edition, through the 2000 Addenda of ASME Code, Section XI as the code of record.

## 2..0 REGULATORY BASIS

2.1 10 CFR 50.55a(g), "Inservice Inspection Requirements," requires, in part, that Classes 1, 2, 3, metal containment, and concrete containment components and their supports meet the requirements of Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the ASME BPV Code or equivalent quality standards.

10 CFR 50.55a states the requirements governing the use of Code Cases, as amended by Regulatory Guide, 1.147, Revision 17, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1" which accepts ASME Code Case N-460, "Alternative Examination Coverage for Class 1 and Class 2 Welds" and requires examination of essentially 100 percent of the weld length and clarified by the code case to be greater than 90 percent coverage of the examination volume, or surface area, as applicable.

### 3.0 REQUEST FOR ADDITIONAL INFORMATION

3.1 For RR I3R-11, please identify the non-destructive examination procedure used in the subject ultrasonic examinations (e.g., ASME Code, Section XI, Appendix VIII; or Section V, Article 4; or other).

3.2 Please state the material of construction of the Pressurizer (PZR) nozzles contained in the table in RR I3R-11.

3.3 The licensee's enclosed inspection reports states that 0, 45, and 60 degree angles were used in the examinations of the subject PZR nozzles-to-vessel welds. Please fully clarify the wave modality and insonification angles used for each of the ultrasonic examinations of the PZR nozzle-to-vessel welds contained in RR I3R-11.

If you have any questions, please contact John Klos per the contact information below.

**John Klos**

**DORL Callaway Project Manager**

**U.S. NRC, Office of Nuclear Reactor Regulation,**

**Division of Operating Reactor Licensing**

**NRC/NRR/DORL/LPL4-1, MS O8H4**

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