

May 15, 2017

ULNRC-06370

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-04 FOR RELIEF FROM ASME SECTION XI CODE  
INSERVICE INSPECTION REQUIREMENTS (TAC NO. MF8524)**

Reference:

1. ULNRC-06333, "Request for Relief from Requirements of ASME Section XI Code Inservice Inspection Requirements (Relief Request I4R-04)," dated October 25, 2016 (ADAMS Accession No. /ML16299A451)

Pursuant to 10 CFR 50.55a(g)(5)(iii), Reference 1 transmitted a request for relief from the requirements of ASME Section XI Appendix VIII for qualification of ultrasonic testing (UT) that will be performed on eight dissimilar metal (DM) nozzle-to-safe end welds and eight austenitic safe end-to-piping welds that are listed in the relief request, on the basis that the accuracy requirement of Supplement 14 to Appendix VIII was impractical to achieve.

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-04 attached to the Reference 1 letter.

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After submittal of Relief Request I4R-04 via Reference 1, it was found that that the relief request had inappropriately cited superseded ASME Code Case N-716, which had not been approved for use by the NRC Staff. The appropriate reference is to ASME Code Case N-716-1, which was approved for use in Regulatory Guide 1.147, Rev. 17. Thus, to be clear, the austenitic welds that are listed in the relief request are categorized in accordance with ASME Code Case N-716-1. A corrected page for previously submitted Relief Request I4R-04 is attached.

This letter does not contain new commitments.

If there are any questions, please contact me at 573-676-8719.

Sincerely,

 PIN 6381  
R. C. Wink  
Manager, Regulatory Affairs

JPK

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**Attachment to  
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**Corrected Page (Page 1 of 5) for 10 CFR 50.55a Request Number I4R-04**

**1 Page**

**10 CFR 50.55a Request Number I4R-04**

**Proposed Alternative  
In Accordance with 10 CFR 50.55a(g)(5)(iii)  
--Inservice Inspection Impracticality--**

**1. ASME Code Component(s) Affected**

The components covered under relief request I4R-04 include four dissimilar metal hot-leg welds, four dissimilar metal cold-leg welds, and eight austenitic welds. The inspections of the dissimilar metal welds are conducted according to ASME Code Case N-770-1, Inspection Item A-2, "Unmitigated butt weld at Hot Leg operating temperature  $(-2410) \leq 625^{\circ}\text{F}$  ( $329^{\circ}\text{C}$ )," and Inspection Item B, "Unmitigated butt weld at Cold Leg operating temperature  $(-2410) \geq 525^{\circ}\text{F}$  ( $274^{\circ}\text{C}$ ) and  $< 580^{\circ}\text{F}$  ( $304^{\circ}\text{C}$ )." The dissimilar metal welds are detailed in Table 1.

The austenitic welds are inspected in accordance with Callaway's risk-informed ISI program. In accordance with ASME Code Case N-716-1, these welds are categorized as Inspection Category R-A Item Number R1.20, "Elements not Subject to a Damage Mechanism." The austenitic welds are detailed in Table 2.

Table 1: Large Bore Dissimilar Metal (DM) Welds

<b>Weld Designation</b>	<b>N-770-1 Item</b>	<b>Weld Description</b>	<b>Inner Diameter</b>	<b>Nominal Wall Thickness</b>
2-RV-301-121-A	A-2	Loop 1 outlet nozzle to safe-end	29 in.	2.5 in.
2-RV-301-121-B	A-2	Loop 2 outlet nozzle to safe-end	29 in.	2.5 in.
2-RV-301-121-C	A-2	Loop 3 outlet nozzle to safe-end	29 in.	2.5 in.
2-RV-301-121-D	A-2	Loop 4 outlet nozzle to safe-end	29 in.	2.5 in.
2-RV-302-121-A	B	Loop 1 inlet safe-end to nozzle	27.5 in	2.38 in.
2-RV-302-121-B	B	Loop 2 inlet safe-end to nozzle	27.5 in	2.38 in.
2-RV-302-121-C	B	Loop 3 inlet safe-end to nozzle	27.5 in	2.38 in.
2-RV-302-121-D	B	Loop 4 inlet safe-end to nozzle	27.5 in	2.38 in.

Table 2: Large Bore Austenitic Welds

<b>Weld Designation</b>	<b>Weld Description</b>	<b>Inner Diameter</b>	<b>Nominal Wall Thickness</b>
2-BB-01-F103	Loop 1 outlet safe-end to pipe	29 in.	2.5 in.
2-BB-01-F102	Loop 1 inlet elbow to safe-end	27.5 in	2.38 in.
2-BB-01-F203	Loop 2 outlet safe-end to pipe	29 in.	2.5 in.
2-BB-01-F202	Loop 2 inlet elbow to safe-end	27.5 in	2.38 in.
2-BB-01-F303	Loop 3 outlet safe-end to pipe	29 in.	2.5 in.
2-BB-01-F302	Loop 3 inlet elbow to safe-end	27.5 in	2.38 in.
2-BB-01-F403	Loop 4 outlet safe-end to pipe	29 in.	2.5 in.
2-BB-01-F402	Loop 4 inlet elbow to safe-end	27.5 in	2.38 in.