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UNION ELECTRIC

April 25, 1994

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ULNRC-2992

Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT
ASME CODE CASE N-416-1

The American Society of Mechanical Engineers has submitted Code Case N-416-1 to the Nuclear Regulatory Commission for review and approval. Code Case N-416-1 is entitled "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding." Approval is hereby requested for use of the provisions of Code Case N-416-1 for ASME Class 1 and Class 2 systems. Approval for use on ASME Class 3 systems is specifically excluded from this request, and will be submitted for consideration on a separate letter (ULNRC-2993). The reason for separate submittal of ASME Class 3 systems is to facilitate timely approval for use of N-416-1 in ASME Class 1 and 2 systems.

Approval is requested by September, 1994, to permit utilization during Callaway's next refueling outage (currently scheduled for Spring, 1995). The need for timely approval is a result of Callaway's implementation of Code Case N-416-0. N-416-0 permits deferral of hydrostatic testing for specific ASME Class 2 repairs and replacements until the end of the 10-year ISI interval. Additionally, the NRC has approved Code Case N-498, which permits elimination of 10-year ISI hydrostatic testing for ASME Class 1 and 2 systems. Callaway has adopted Code Case N-498 which, with the exception of the tests deferred under N-416-0, eliminates the need for 10-year ISI hydrostatic tests. Approval of Code Case

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N-416-1 is needed in order to eliminate the requirement for hydrostatic testing of the components deferred in accordance with Code Case N-416-0. Cost savings resulting from elimination of these deferred hydrostatic tests are conservatively estimated at approximately $19,000.00. Cost savings resulting from elimination of all Class 1, 2, and 3 repair/replacement hydrostatic tests are estimated at approximately $225,000.00. Significant reductions in radiation exposure will also result.

Very truly yours,

Donald F. Schnell

CDN/kea

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