

1901 Chouteau Avenue  
Post Office Box 149  
St. Louis, Missouri 63166  
314-654-2850



April 25, 1994

Donald F. Schnell  
Senior Vice President  
Nuclear

U.S. Nuclear Regulatory Commission  
ATTN.: Document Control Desk  
Mail Station P1-137  
Washington, D.C. 20555

ULNRC-2993

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 3 systems. Approval for use on ASME Class 1 and Class 2 systems is excluded from this request, and is addressed on a separate letter (ULNRC-2992).

Approval is requested by October, 1994, to permit utilization during Callaway's next refueling outage (Spring 1995). The need for timely approval is a result of the upcoming implementation of numerous ASME Section XI repair and replacement activities at the Callaway Plant and the extensive cost and scheduling impacts associated with hydrostatic testing. Cost savings resulting from elimination of all Class 1, 2, and 3 repair/replacement hydrostatic tests are estimated at approximately \$225,000.00. Union Electric considers the alternative testing requirements proposed in the Code Case to constitute a reasonable, safe alternative to the existing hydrostatic testing requirements, and requests timely approval.

Very truly yours,

A handwritten signature in cursive script that reads "Donald F. Schnell".

Donald F. Schnell

CDN/kea

94050400B7 940425  
PDR ADDCK 050004B3  
P PDR

A0A7  
1/0

cc: T. A. Baxter, Esq.  
Shaw, Pittman, Potts & Trowbridge  
2300 N. Street, N.W.  
Washington, D.C. 20037

M. H. Fletcher  
CFA, Inc.  
18225-A Flower Hill Way  
Gaithersburg, MD 20879-5334

L. Robert Greger  
Chief, Reactor Project Branch 1  
U.S. Nuclear Regulatory Commission  
Region III  
801 Warrenville Road  
Lisle, IL 60532-4351

Bruce Bartlett  
Callaway Resident Office  
U.S. Regulatory Commission  
RR#1  
Steedman, MO 65077

L. R. Wharton (2)  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
1 White Flint, North, Mail Stop 13E21  
11555 Rockville Pike  
Rockville, MD 20852

Manager, Electric Department  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102