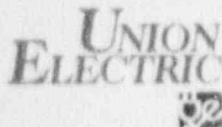


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Donald F. Schnell
Senior Vice President
Nuclear

December 11, 1990

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

Gentlemen:

ULNRC-2338

CALLAWAY PLANT
DOCKET NUMBER 50-483
PRESSURIZER SURGE LINE THERMAL STRATIFICATION
References: 1) NRC Bulletin 88-11, dated
December 20, 1988
2) ULNRC-1936, dated March 10, 1989
3) T. W. Alexion letter to
D. F. Schnell dated May 19, 1989
4) ULNRC-2084, dated September 28, 1989
5) WCAP-12277 dated June 1989
6) A. T. Gody, Jr. letter to
D. F. Schnell, dated September 17, 1990

Reference 1, Action Item 1.d, requires Union Electric to update the ASME Class 1 stress and fatigue reports by incorporating loads resulting from thermal stratification in the pressurizer surge line. This action is required to be complete no later than two years after receipt of the Bulletin. Union Electric, in Reference 4, committed to having this action item completed by December, 1990.

UE requests an extension of the December, 1990 date until March 31, 1991. An extension is required to allow for completion of the updated stress/fatigue analysis. A Westinghouse Owners Group (WOG) program to develop the methodology for updating the stress and fatigue reports has been completed. This program, contained in WCAP-12639, shows that Callaway (Group 15, Plant 46) has acceptable stresses and cumulative usage factor limits. Westinghouse and Union Electric are currently performing the plant specific applicability study as described in WCAP-12639.

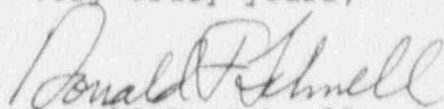
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In addition, Callaway has only used 2 of the 10 additional Heatup and Cooldown cycles as discussed and allowed by NRC in References 5 and 6. Therefore, there are no short-term safety concerns associated with the thermal stratification effects during the additional three months of plant operations needed to complete the applicability study.

If you have any questions concerning this letter, please contact me.

Very truly yours,


Donald F. Schnell

WEK/kea

STATE OF MISSOURI)
) S S
CITY OF ST. LOUIS)

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Senior Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell
Donald F. Schnell
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this 11th day
of December, 1990.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
ST. LOUIS COUNTY

cc: T. A. Baxter, Esq.
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