



1901 Gratiot Street, St. Louis

Donald F. Schnell
Vice President

April 1 , 1988

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

ULNRC- 1753

DOCKET 50-483
CALLAWAY PLANT
ADDITIONAL INFORMATION CONCERNING THE
CALLAWAY PLANT INSERVICE INSPECTION PROGRAM PLAN
References: 1) ULNRC-1457, dated March 3, 1987
2) ULNRC-1481, dated April 2, 1987

The referenced letters transmitted the latest information on the Callaway Inservice Inspection Program Plan. Enclosed please find Relief Requests G through N to the subject plan. These relief requests are being submitted as a result of observations made during Refuel II and are in addition to the previously submitted relief requests.

Please contact us if there are any questions concerning these relief requests.

Very truly yours,

Donald F. Schnell

WEK/mat

Enclosure

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PDR ADOCK 0500C483
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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 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
Vice President
Nuclear

SUBSCRIBED and sworn to before me this 11th day of April, 1988

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1989
ST. LOUIS COUNTY

cc: Gerald Charnoff, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Dr. J. O. Cermak
CFA, Inc.
4 Professional Drive (Suite 110)
Gaithersburg, MD 20879

W. L. Forney
Chief, Reactor Project Branch 1
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Bruce Little
Callaway Resident Office
U.S. Nuclear Regulatory Commission
RR#1
Steedman, Missouri 65077

Tom Alexion (2)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop 316
7920 Norfolk Avenue
Bethesda, MD 20014

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

CALLAWAY ISI

RELIEF REQUEST G

System: Reactor Coolant

Category: B-G-2

Component Description: Valve BB-8378B, a 3" check valve from Chemical and Volume Control System (CVCS) to Reactor Coolant System cold leg A. Identified for inspection in the CVCS program plan.

Code Requirement: Visual inspection (VT-1) of bolting surfaces as required by item B7.70, category B-G-2.

Areas for Relief: 100% of the bolting.

Basis for Relief: Due to the encapsulation of the body to bonnet joint the bolting is inaccessible without removal of the welded encapsulation. The encapsulation is a modification supplied by the vendor (Westinghouse) which was installed by Union Electric.

Alternate Test Method: None; provided the valve is not disassembled. The reactor coolant system leakage detection system and ISI visual examinations for leakage will establish the integrity of the pressure boundary. When the encapsulation is removed the required exam will be performed.

CALLAWAY ISI
RELIEF REQUEST H

System: Reactor Coolant

Category: B-B

Component Description: Steam Generator A. Bottom Head to Tubesheet Weld 2-EBB01A-SEAM-iW.

Code Requirements: Volumetric examination of weld and 1/2 vessel thickness on each side of weld from two directions.

Areas for Relief: 35% of weld volume.

Basis for Relief: Tubesheet obstructs full examination from one side and Support lugs and a code data plate obstruct examination at four circumferential locations.

Alternate Testing: None. Reactor Coolant leakage detection system and ISI visual inspections for leakage will establish the integrity of this weld

CALLAWAY ISI
RELIEF REQUEST I

System: Reactor Coolant

Category: C-A

Component Description: Steam Benerator B. Tubesheet to Stub Barrel weld
2-EBBOB-SEAM-2-W.

Code Requirements: Volumetric examination of weld and .5 inch on
each side weld from two directions.

Areas for Relief: 30% of weld volume.

Basis for Relief: Tubesheet obstructs full examination from one
side. Three manways, a pipe attachment and a
code data plate, obstruct examination at various
circumferential locations.

Alternate Testing: None. Extent of volumetric examination and ISI
visual inspection for leakage will establish the
integrity of this weld.

CALLAWAY ISI
RELIEF REQUEST J

System: Reactor Coolant

Category: B-B

Component Description: Pressurizer, Bottom Head to Shell Weld
2-TBB03-CIRCUM-5-W.

Code Requirements: Volumetric examination of weld and 1/2 vessel
head thickness on each side of weld from two
directions.

Areas for Relief: 2% of weld volume.

Basis for Relief: Five 1 inch sample lines and 8 welded lugs
obstruct examination at various circumferential
locations.

Alternate Testing: None. Reactor Coolant leakage detection system,
ISI visual inspections for leakage, and the
extent of the completed examination establish
the integrity of this weld.

CALLAWAY ISI
RELIEF REQUEST K

System: Reactor Coolant

Category: B-A

Component Description: Reactor Vessel, Reactor Vessel Closure Head

Meridional welds:

2-CH-101-104-B

2-CH-101-104-C

Code Requirements: Volumetric examination of weld and 1/2 vessel head thickness on each side of weld from two directions.

Areas for Relief: Vessel lifting lugs obstruct a full examination from one side.

Alternate Testing: None. Extent of examination, Reactor Coolant leakage detection system, and ISI visual examinations for leakage will establish the integrity of these welds.

CALLAWAY ISI
RELIEF REQUEST L

System: Reactor Coolant

Category: B-A

Component Description: Reactor Vessel, Reactor Vessel Closure Head to
flange weld:
2-CH-101-101

Code Requirements: Volumetric examination of weld and 1/2 closure
head thickness on each side of weld from two
directions.

Areas for Relief: 52% of weld volume.

Basis for Relief: Closure flange obstructs full examination from
one side and Closure Head lifting lugs obstruct
examination at three circumferential locations.

Alternate Testing: None. Extent of examination, Reactor Coolant
leakage detection system, and ISI visual exami-
nations for leakage will establish the integrity
of the weld.

CALLAWAY ISI
RELIEF REQUEST M

System: See attached pages
Category: Piping, See attached pages
Component Description: See attached pages
Code Requirement: See attached pages
Areas for Relief: See attached pages
Basis for Relief: See attached pages
Alternate Test Method: See attached pages

CLASS 1 PIPING

SYSTEM: Accumulator Safety Injection

<u>Category</u>	<u>Description</u>	<u>Component I.D.</u>	<u>Code Requirements</u>	<u>Area for Relief</u>	<u>Basis for Relief</u>	<u>Alternate Testing</u>
B-J	6" pipe to 2" Sockolet	2-EP-01-S011J	Volumetric examination from two directions of the weld	50% of weld volume	Tee geometry obstructs scan path	None: Extent of examination, surface exam, and ISI visual for leakage will establish the integrity of this weld.
B-J	Valve BB8948A to 10" pipe	2-EP-01-F007	Volumetric examination from two directions of the weld	45% of weld volume	Permanent Energy Absorption Chamber obstructs scan path	None: Extent of examination, surface exam, and ISI visual for leakage will establish the integrity of this weld.
B-J	Valve BB8948B to 10" pipe	2-EP-02-F007	Volumetric examination from two directions and surface examination of the weld	10% of weld volume 26% of weld surface	Permanent Energy Absorption Chamber obstructs scan path	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.

AUGMENTED PIPING

SYSTEM: Chemical and Volume Control

<u>Category</u>	<u>Description</u>	<u>Component I.D.</u>	<u>Code Requirements</u>	<u>Area for Relief</u>	<u>Basis for Relief</u>	<u>Alternate Testing</u>
N/A	3" pipe to valve HV8152 weld	2-BG-03-F002	Augmented volumetric examination required for Break Exclusion (NUREG 0800)	10% of weld volume	Valve to pipe geometry obstructs circumferential examination	None: Extent of examination completed and ISI visual for leakage will establish the integrity of this weld.
N/A	Valve HV8152 to 3" pipe weld	2-BG-03-F003	Augmented volumetric examination required for break Exclusion (NUREG 0800)	10% of weld volume	Valve to pipe geometry obstructs circumferential examination	None: Extent of examination completed and ISI visual for leakage will establish the integrity of this weld.
N/A	Orifice flange FE-145 to 2" pipe	2-BG-09-FW389	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	50% of weld volume	Flange prevents complete examination.	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	Orifice flange FE-143 to 2" pipe	2-BG-09-FW419	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	50% of weld volume	Flange prevents complete examination.	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	Orifice flange FE-144 to 2" pipe	2-BG-09-FW434	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	50% of weld volume	Flange prevents complete examination.	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	Orifice flange FE-142 to 2" pipe	2-BG-09-FW404	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	50% of weld volume	Flange prevents complete examination.	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	Orifice flange FE-145 to 2" pipe	2-BG-09-FW390	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	50% of weld volume	Flange prevents complete examination.	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	2" pipe to 2" x 2" x 3/4" Tee	2-BG-09-FW393	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	20% of weld volume	Tee geometry prevents complete examination	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.

SYSTEM: Chemical and Volume Control (Continued)

<u>Category</u>	<u>Description</u>	<u>Component I.D.</u>	<u>Code Requirements</u>	<u>Area for Relief</u>	<u>Basis for Relief</u>	<u>Alternate Testing</u>
N/A	2" x 2" x 3/4" Tee to Pipe	2-BG-09-FW392	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	20% of weld volume	Tee geometry prevents complete examination	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	2" Pipe to 2" x 2" x 3/4" Tee	2-BG-09-FW439	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	10% of weld volume	Tee geometry prevents complete examination	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	2" x 2" x 3/4" Tee to 2" Pipe	2-BG-09-FW438	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	10% of weld volume	Tee geometry prevents complete examination	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.

SYSTEM: Main Feedwater

<u>Category</u>	<u>Description</u>	<u>Component I.D.</u>	<u>Code Requirements</u>	<u>Area for Relief</u>	<u>Basis for Relief</u>	<u>Alternate Testing</u>
N/A	4" Elbow to Valve V126	2-AE-05-F031	Augmented volumetric examination required for Break Exclusion (NUREG 0800)	25% of weld volume	Valve to pipe geometry obstructs complete examination	None: Extent of examination completed and ISI visual for leakage will establish the integrity of this weld.
N/A	14" Pipe to 14" x 4" Weldolet	2-AE-05-S004A	Augmented volumetric examination required for Break Exclusion (NUREG 0800)	25% of weld volume	Fitting geometry does not allow complete examination	None: Extent of examination completed and ISI visual for leakage will establish the integrity of this weld.

SYSTEM: Reactor Coolant

<u>Category</u>	<u>Description</u>	<u>Component I.D.</u>	<u>Code Requirements</u>	<u>Area for Relief</u>	<u>Basis for Relief</u>	<u>Alternate Testing</u>
N/A	Valve V119 to 2" Pipe	2-BB-08-FW080	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	10% of weld volume	Valve geometry prevents complete examination	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	2" Pipe to Valve V119	2-BB-08-FW081	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	10% of weld volume	Valve geometry prevents complete examination	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	2" Pipe to 2" Elbow	2-BB-08-FW085	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	20% of weld volume	Inner radius of elbow prevents complete examination	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.
N/A	2" Elbow to 2" Pipe	2-BB-08-FW084	Augmented volumetric examination for break exclusion boundary (NUREG 0800)	20% of weld volume	Inner radius of elbow prevents complete examination	None: Extent of examination and ISI visual for leakage will establish the integrity of this weld.

SYSTEM: Containment Spray

<u>Category</u>	<u>Description</u>	<u>Component I.D.</u>	<u>Code Requirements</u>	<u>Area or Relief</u>	<u>Basis for Relief</u>	<u>Alternate Testing</u>
N/A	12" Pipe to Valve EN-V003	2-EN-01-F001	Augmented volumetric examination	10% of weld volume	Valve geometry obstructs complete examination	None: Extent of examination and surface exam will establish the integrity of this weld.
N/A	12" Pipe to Valve EV-V008	2-EN-02-F005	Augmented volumetric examination	30% of weld volume	Valve geometry obstructs complete examination	None: Extent of examination and surface exam will establish the integrity of this weld.
N/A	14" Pipe to Flange	2-EN-02-S005B	Augmented volumetric examination	20% of weld volume	Flange geometry obstructs complete examination	None: Extent of examination and surface exam will establish the integrity of this weld.

SYSTEM: Containment Spray (Continued)

<u>Category</u>	<u>Description</u>	<u>Component I.D.</u>	<u>Code Requirements</u>	<u>Area for Relief</u>	<u>Basis for Relief</u>	<u>Alternate Testing</u>
N/A	12" Pipe to Valve EN-V009	2-EN-02-F009	Augmented volumetric examination	20% of weld volume	Valve geometry obstructs complete examination	None: Extent of exam- ination and surface exam will establish the integ- rity of this weld.
N/A	14" Elbow to Pump PEN01B	2-EN-02-F007	Augmented volumetric examination	20% of weld volume	Pump geometry obstructs complete examination	None: Extent of exam- ination and surface exam will establish the integ- rity of this weld.

CALLAWAY ISI

RELIEF REQUEST N

System: All ASME class 1, 2, and 3 systems

Category/Item: F-C

Component Description: Supports with Mechanical or Hydraulic Snubbers

Code Requirement: Operability testing of snubbers and visual inspection (VT-3 and VT-4) of snubbers and supports with snubbers.

Areas of Relief: 100%

Basis for Relief: Callaway implements a testing and visual inspection program in accordance with the Program Plan identified in the Plant Technical Specifications. This program Plan meets the testing and inspection requirements of the Operation and Maintenance (OM)-4 document. This document was written by the ASME Section XI Working Group on Mechanical Equipment Restraints. This document has also been invoked in its entirety within ASME Section XI 1986 Edition, Winter 1987 Addenda.

Alternate Test Method: None