

UNION ELECTRIC COMPANY 1901 Gratiot Street, St. Louis

1901 Granor Sileer, Si. Louis

Donald F. Schnell Vice President

February 20, 1986

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Denton:

ULNRC-1260

## CALLAWAY PLANT DOCKET NUMBER 50-483 LICENSE NUMBER NPF-30 REQUEST FOR USE OF ASME CODE CASE N-416

Union Electric Company is submitting this letter to request the concurrence of the Nuclear Regulatory Commission to use ASME Section XI Code Case N-416 entitled "Alternative rules for Hydrostatic Testing of Repair or Replacement of Class 2 Piping." Use of this Code Case would allow Union Electric to avoid an additional hydrostatic test on secondary loops C and D, including the steam generators, because of minor weld buildup to repair steam cutting experienced on steam generator C and D secondary manway flange faces.

This repair activity, which includes replacement of the manway cover itself, is scheduled for the refueling outage in March, 1986. After discussions with the Callaway NRC Project Manager, Union Electric was informed that Code Case N-416 has been reviewed by the NRC and found acceptable for future incorporation as an approved Code Case. Since the subject ASME Code Case is not currently listed in Regulatory Guide 1.147 as an approved Code Case, Union Electric is requesting timely NRC concurrence for use as described during the March, 1986 outage.

Very truly yours,

Donald F. Schnell

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RPW/kc



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.

Vice President Nuclear

SUBSCRIBED and sworn to before me this 20th day of February, 1986.

BARBARA J. PEAFFU CU NOTARY PUBLIC, STATE OF MISSOURI MY COMMISSION EXPIRES APRIL 22, 1989 ST. LOUIS COUNTY.

cc: Gerald Charnoff, Esq. Shaw, Pittman, Potts & Trowbridge 1800 M. Street, N.W. Washington, D.C. 20036

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