



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

May 17, 2013

Mr. Adam C. Heflin
Senior Vice President and
Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 – REQUEST FOR ADDITIONAL INFORMATION
RE: I3R-14, PROPOSED ALTERNATIVE TO ASME CODE, SECTION XI
REQUIREMENTS FOR LEAKAGE TESTING OF REACTOR PRESSURE
VESSEL HEAD FLANGE LEAKOFF LINES (TAC NO. MF1745)

Dear Mr. Heflin:

By letter dated May 2, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13123A095), as supplemented by letter dated May 6, 2013 (ADAMS Accession No. ML13126A304), Union Electric Company (the licensee), submitted "Proposed Alternative to ASME [American Society of Mechanical Engineers] Section XI Requirements for Leakage Testing of Reactor Pressure Vessel Head Flange Leakoff Lines (Relief Request I3R-14)," for Nuclear Regulatory Commission (NRC) review and approval.

The NRC staff provided verbal authorization on May 6, 2013, for the proposed alternative described in request I3R-14 for the remainder of the third 10-year inservice inspection interval, which is scheduled to end on December 18, 2014 (ADAMS Accession No. ML13126A320). The staff has reviewed the information provided in your application and determined that additional information is required in order to complete its formal review.

A. Heflin

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Please provide a response to the enclosed questions by July 10, 2013. If circumstances result in the need to revise the requested response date, please contact me at 301-415-2296 or via e-mail at Fred.Lyon@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Lyon".

Carl F. Lyon, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

Enclosure:
As stated

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REQUEST FOR ADDITIONAL INFORMATION

RELIEF REQUEST I3R-14

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NO. 50-483

By letter dated May 2, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13123A095), as supplemented by letter dated May 6, 2013 (ADAMS Accession No. ML13126A304), Union Electric Company (dba Ameren Missouri, the licensee) submitted "Proposed Alternative to ASME Section XI Requirements for Leakage Testing of Reactor Pressure Vessel Head Flange Leakoff Lines (Relief Request I3R-14)," for Nuclear Regulatory Commission (NRC) review and approval. In lieu of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, paragraph IWC-5221, requirement to pressurize the subject leakoff lines to normal operating pressure prior to performing a VT-2 visual examination, the licensee proposes to use the pressure developed when the refueling cavity is filled to the normal refueling water level. In order to complete its review, the NRC staff requests the following additional information.

1. Please describe any incidents of significant reactor pressure vessel flange O-ring leakage at Callaway Plant.
2. When there is leakage past the inner O-ring and the valve on the inner O-ring leakage line is closed, the line between the flange and the closed valve may be pressurized to the reactor operating pressure, 2235 pounds per square inch gauge.
 - a. Please describe any plans for performing a VT-2 visual examination on the inner O-ring line while it is pressurized to reactor operating pressure.
 - b. Please provide the length of the line that can be visually inspected.
 - c. Please describe how much of the inspected length is insulated.
 - d. Please provide the hold time after the line is pressurized before a VT-2 visual examination is performed.
 - e. Please describe any hardship associated with performing the examination (i.e., temperature, radiological dose, etc.).
 - f. What would be the expected radiation field in the area being inspected during the time that the pressurized line could be examined? Please clarify the time needed to perform the VT-2 visual examination.

Enclosure

A. Heflin

- 2 -

Please provide a response to the enclosed questions by July 10, 2013. If circumstances result in the need to revise the requested response date, please contact me at 301-415-2296 or via e-mail at Fred.Lyon@nrc.gov.

Sincerely,

/RA/

Carl F. Lyon, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-483

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ADAMS Accession No.: ML13136A059

*email dated

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DATE	5/17/13	5/16/13	5/13/13	5/17/13	5/17/13

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