



Callaway Plant

October 11, 2016

ULNRC-06332

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
RESULTS OF STEAM GENERATOR TUBE IN-SERVICE INSPECTION**

In accordance with Callaway Plant Technical Specification 5.6.10, the enclosed report provides the results of the most recent steam generator tube in-service inspection performed at Callaway Plant. This report documents that the steam generator tube integrity performance criteria have been met for operating cycles 19, 20, and 21, and also demonstrates that there is reasonable assurance that the performance criteria will be met for the upcoming 3-cycle operating period, consisting of cycles 22, 23, and 24.

This letter does not contain new commitments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Barry L. Cox", written over a horizontal line.

Barry L. Cox,
Senior Director Nuclear Operations

DRB

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1.0 PURPOSE

The purpose of this report is to document that the Callaway Unit-1 steam generator tube integrity performance criteria have been met for operating cycles 19, 20, and 21 (November 2011 to April 2016 of 3.975 EFPY duration) and to also demonstrate that there is reasonable assurance that the performance criteria will be met for the upcoming 3-cycle operating period, consisting of cycles 22, 23, and 24, not to exceed 4.25 EFPY.

2.0 REPORTING REQUIREMENTS

Technical Specification 5.6.10 requires that "A report shall be submitted within 180 days after initial entry into MODE 4 following completion of an inspection performed in accordance with Specification 5.5.9, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each steam generator;
- b. Degradation mechanisms found;
- c. Nondestructive examination techniques utilized for each degradation mechanism;
- d. Location, orientation (if linear), and measured size (if available) of service induced indications;
- e. Number of tubes plugged during the inspection outage for each degradation mechanism;
- f. The number and percentage of tubes plugged to date, and the effective plugging percentage in each steam generator; and
- g. The results of condition monitoring, including the results of tube pulls and in-situ testing.

3.0 SUMMARY

The steam generator tube in-service inspections were completed by AREVA during the Refuel 21 outage. An in-service inspection was performed on all four steam generators, primary and secondary side. The scope of inspections performed is described in the following inspection report. The service related degradation mechanisms identified by eddy current inspection (primary side) were 543 AVB (anti-vibration bar) wear indications and 131 TSP (tube support plate) wear indications in total from all four steam

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generators. Callaway's plugging limit was set at 30% TW (through wall), conservatively, to maintain tube integrity for cycle 22, 23 and 24. In total, 25 tubes were removed from service due to AVB wear. TSP wear had no impact on RF-21 tube plugging. This equates to a total of 0.230% of tubes, from all four steam generators removed from service to date.

Table 1
Callaway Tube Cumulative Plugging Status

| Outage | SGA | SGB | SGC | SGD | Total |
|----------------------------|------------|------------|------------|------------|--------------|
| Pre-Service | 1 | 0 | 0 | 0 | 1 |
| 1R15 | 0 | 0 | 0 | 0 | 0 |
| 1R18 | 10 | 6 | 12 | 1 | 29 |
| 1R21 | 9 | 0 | 14 | 2 | 25 |
| Total Tubes Plugged | 20 | 6 | 26 | 3 | 55 |
| Total Tubes | 5872 | 5872 | 5872 | 5872 | 23488 |
| Total Percentage | 0.341% | 0.102% | 0.443% | 0.051% | 0.230% |
| Limit (%) | 10.0% | 10.0% | 10.0% | 10.0% | 10.0% |

Sludge Lancing (secondary side) was performed on all 4 steam generators. A combined total of 25.5 pounds of sludge was collected by AREVA. The steam generator tubes and the top of tubesheet were clean, with exception of a small sludge pile located near the center of each steam generator's top of tubesheet.

Steam Drum (secondary side) inspections were performed on only two steam generators, SG-A and SG-D. No loose parts (foreign material) or loose hardware was detected in either steam generator. Finally, the Condition Monitoring Report concluded that the Callaway steam generator tubes satisfied the structural integrity performance criterion, accident induced leakage criterion and operational leakage criterion.

4.0 INSPECTION REPORT

The Callaway Plant was shut down on April 2, 2016 for its 21st refueling outage. During the refueling outage an in-service inspection was performed on all four steam generators. The inspection scope was as follows:

- **Eddy current Bobbin probe examinations (All 4 SGs):**
 - 100% of all in-service tubes, full length tube-end to tube-end
- **Eddy current X-probe examinations (All 4 SGs):**
 - Tubesheet periphery, 3-tubes deep

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- All cold leg tubes identified as having non-nominal tubesheet drilled hole diameters
- 20% of hot leg tubes identified with sludge from the 1R18 sludge analysis in all four SGs.
- All 1R21 Bobbin Distorted Support Signal with Indication (DSI) indications (i.e., TSP wear) in the Hot Leg of SGA and SGB
- **Special interest examinations:**
 - All AVB wear with a depth $\geq 28\%TW$
 - All new AVB indications with a depth $\geq 14\%TW$
 - All AVB indications with a growth $>14\%TW$ over the past three cycles
 - Select tubes for AVB wear
 - All 1R21 Bobbin DSI indications
- **Secondary Side Inspections:**
 - Top of Tubesheet (TTS) water lancing in all four SGs
 - Pre-lancing quick-look visual inspection in SG C and SG D
 - Foreign Object Search and Retrieval (FOSAR) performed in all four SG
 - Hot leg and cold leg TTS annulus area (post-lancing) looking in-bundle at the periphery tubes
 - No-tube lane (post-lancing)
 - Inner bundle passes in the hot leg TTS sludge pile region (post-lancing)
 - Visual inspections of steam drums in SG-A and SG-D
 - Inspections included the loose part trapping screen, the riser barrels, the feedring and J-nozzles 1, 2, 3, 4, 29, and 30
- **Visual Examinations**
 - As-found and as-left visual examinations of primary channel heads (both Hot Leg and Cold Leg)
 - NSAL 12-1 (and IN 2013-20) primary bowl inspections in all four SGs (both Hot Leg and Cold Leg)
 - Visual inspections of all plugs installed in the Callaway SGs both prior and during 1R21
 - EVT-1 on SG-A primary nozzle inner radius. The area of interest consisted of all accessible surfaces of the nozzle inside radius section.

4.1 Primary Side Inspection

The bobbin probe (ETSS 96004.1) is used for depth sizing AVB wear. The +Point (ETSS 96910.1) is used for depth and length sizing of TSP wear and providing extent and length sizing of AVB wear.

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4.1.1 Eddy Current Inspections

Table 2
RF21 Eddy Current Inspection Scope Summary

| Scope Description | | | | SG A | | | | SG B | | | |
|---------------------------------------|------|-------|---------|-----------------|-------------|-------------|---------------------|-----------------|-------------|-------------|---------------------|
| Exam Description | Leg | Probe | Extent | Planned | Acquired | Resolved | % Complete Resolved | Planned | Acquired | Resolved | % Complete Resolved |
| Bobbin Exams | | | | | | | | | | | |
| Full Length Rows >= 8 | HOT | 610HS | TECTEH | 5525 | 5525 | 5525 | 100.00% | 5530 | 5530 | 5530 | 100.00% |
| H/L CandyCane Rows 2-5 | HOT | 610HS | 08CTEH | 270 | 270 | 270 | 100.00% | 270 | 270 | 270 | 100.00% |
| H/L CandyCane Row 1 | HOT | 610HS | 08CTEH | 66 | 66 | 66 | 100.00% | 66 | 66 | 66 | 100.00% |
| C/L Straight R1-5 | COLD | 610HS | 08CTEC | 336 | 336 | 336 | 100.00% | 336 | 336 | 336 | 100.00% |
| Array Exams | | | | | | | | | | | |
| H/L Array | HOT | 610XP | 01HTEH | 965 | 965 | 965 | 100.00% | 965 | 965 | 965 | 100.00% |
| H/L Array - Sludge Pile sample | HOT | 610XP | 01HTEH | 22 | 22 | 22 | 100.00% | 21 | 21 | 21 | 100.00% |
| C/L Array | COLD | 610XP | 01CTEC | Scope Cancelled | | | | Scope Cancelled | | | |
| C/L Array - TS Drill Signals | COLD | 610XP | 01CTEC | 7 | 7 | 7 | 100.00% | N/A | N/A | N/A | N/A |
| Special Interest Array/* Point | | | | | | | | | | | |
| Hot Leg Indications | BOTH | 610XP | Various | 52 | 52 | 52 | 100.00% | 35 | 35 | 35 | 100.00% |
| Cold Leg Indications | HOT | 610XP | Various | 26 | 26 | 26 | 100.00% | 7 | 7 | 7 | 100.00% |
| U-Bend Indications | COLD | 610XP | Various | 26 | 26 | 26 | 100.00% | 7 | 7 | 7 | 100.00% |
| | BOTH | 610XP | Various | 35 | 35 | 35 | 100.00% | 17 | 17 | 17 | 100.00% |
| Total - All Exams | | | | 7304 | 7304 | 7304 | 100.00% | 7247 | 7247 | 7247 | 100.00% |

| Scope Description | | | | SG C | | | | SG D | | | |
|---------------------------------------|------|-------|---------|-----------------|-------------|-------------|---------------------|-----------------|-------------|-------------|---------------------|
| Exam Description | Leg | Probe | Extent | Planned | Acquired | Resolved | % Complete Resolved | Planned | Acquired | Resolved | % Complete Resolved |
| Bobbin Exams | | | | | | | | | | | |
| Full Length Rows >= 8 | HOT | 610HS | TECTEH | 5524 | 5524 | 5524 | 100.00% | 5535 | 5535 | 5535 | 100.00% |
| H/L CandyCane Rows 2-5 | HOT | 610HS | 08CTEH | 270 | 270 | 270 | 100.00% | 270 | 270 | 270 | 100.00% |
| H/L CandyCane Row 1 | HOT | 610HS | 08CTEH | 66 | 66 | 66 | 100.00% | 66 | 66 | 66 | 100.00% |
| C/L Straight R1-5 | COLD | 610HS | 08CTEC | 336 | 336 | 336 | 100.00% | 336 | 336 | 336 | 100.00% |
| Array Exams | | | | | | | | | | | |
| H/L Array | HOT | 610XP | 01HTEH | 965 | 965 | 965 | 100.00% | 965 | 965 | 965 | 100.00% |
| H/L Array - Sludge Pile sample | HOT | 610XP | 01HTEH | 28 | 28 | 28 | 100.00% | 19 | 19 | 19 | 100.00% |
| C/L Array | COLD | 610XP | 01CTEC | Scope Cancelled | | | | Scope Cancelled | | | |
| C/L Array - TS Drill Signals | COLD | 610XP | 01CTEC | N/A | N/A | N/A | N/A | 3 | 3 | 3 | 100.00% |
| Special Interest Array/* Point | | | | | | | | | | | |
| Hot Leg Indications | HOT | 610XP | Various | 12 | 12 | 12 | 100.00% | 7 | 7 | 7 | 100.00% |
| Cold Leg Indications | COLD | 610XP | Various | 9 | 9 | 9 | 100.00% | 3 | 3 | 3 | 100.00% |
| U-Bend Indications | BOTH | 610XP | Various | 44 | 44 | 44 | 100.00% | 19 | 19 | 19 | 100.00% |
| Total - All Exams | | | | 7254 | 7254 | 7254 | 100.00% | 7223 | 7223 | 7223 | 100.00% |

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Table 3
RF21 Summary of Wear Indications (Tubes | Indications)

| | SG A | | SG B | | SG C | | SG D | | Total | |
|---------------------|--------------------|-----|------|-----|--------------------|-----|-------------------|----|----------------------------|-----|
| Detected | | | | | | | | | | |
| AVB | 72 | 160 | 47 | 97 | 106 | 240 | 22 | 46 | 247 | 543 |
| TSP | 41 | 56 | 23 | 29 | 19 | 30 | 9 | 16 | 92 | 131 |
| Total | 111 ⁽¹⁾ | 216 | 70 | 126 | 124 ⁽²⁾ | 270 | 30 ⁽³⁾ | 62 | 335 ^{(1) (2) (3)} | 674 |
| Plugged | | | | | | | | | | |
| AVB | 9 | 40 | 0 | 0 | 14 | 56 | 2 | 8 | 25 | 104 |
| TSP | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 |
| Total | 9 ⁽¹⁾ | 41 | 0 | 0 | 14 | 56 | 2 | 8 | 25 ⁽¹⁾ | 105 |
| Returned to Service | | | | | | | | | | |
| AVB | 63 | 120 | 47 | 97 | 92 | 184 | 20 | 38 | 222 | 439 |
| TSP | 40 | 55 | 23 | 29 | 19 | 30 | 9 | 16 | 91 | 130 |
| Total | 102 ⁽¹⁾ | 175 | 70 | 126 | 110 ⁽²⁾ | 214 | 28 ⁽³⁾ | 54 | 310 ^{(1) (2) (3)} | 569 |

NOTES:

1) SGA Tubes 110-66 and 111-73 have both AVB and TSP wear. Tube 111-73 was plugged for AVB wear.

2) SGC Tube 110-72 has both AVB and TSP wear.

3) SGD Tube 88-72 has both AVB and TSP wear.

Callaway plugged 25 tubes due to AVB wear during refuel 21. The total number of tubes repaired to date is 55 (1 plugged during manufacturing). This is 0.230% total tubes plugged to date.

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Table 4
RF21 Summary of AVB Wear Bobbin Indications

| SG | Number of Indications | | New and Repeat Depths | | | Growth Rate of Repeats | | |
|---------|-----------------------|--------|-----------------------|------------------------|---------|------------------------|------------------------|---------|
| | | | (%TW) | | | (%TW/EFY) | | |
| | New | Repeat | Average | Upper 95 th | Maximum | Average | Upper 95 th | Maximum |
| A | 35 | 125 | 15.2 | 29.1 | 33.0 | 1.2 | 2.8 | 3.3 |
| B | 18 | 79 | 14.1 | 26.0 | 30.0 | 0.7 | 2.0 | 3.0 |
| C | 39 | 201 | 15.2 | 32.0 | 37.0 | 1.1 | 3.0 | 6.3 |
| D | 7 | 39 | 14.1 | 33.8 | 38.0 | 0.9 | 3.0 | 3.8 |
| All SGs | 99 | 444 | 14.9 | 30.9 | 38.0 | 1.1 | 3.0 | 6.3 |

AVB wear was reported in each of the four steam generators. A total of 543 AVB wear indications were detected. The maximum reported AVB wear depth was 38%TW.

Table 5
RF21 Summary of TSP Wear Indications

| SG | Number of Indications | | New and Repeat Depths | | | Growth Rate of Repeats | | |
|---------|-----------------------|--------|-----------------------|------------------------|---------|------------------------|------------------------|---------|
| | | | (%TW) | | | (%TW/EFY) | | |
| | New | Repeat | Average | Upper 95 th | Maximum | Average | Upper 95 th | Maximum |
| A | 43 | 13 | 7.27 | 11 | 17.00 | 0.66 | 1.61 | 1.76 |
| B | 20 | 9 | 10.59 | 15 | 16.00 | 1.17 | 1.66 | 1.76 |
| C | 22 | 8 | 9.87 | 14 | 16.00 | 0.69 | 1.42 | 1.51 |
| D | 13 | 3 | 5.38 | 8 | 11.00 | 0.17 | 0.25 | 0.25 |
| All SGs | 98 | 33 | 8.37 | 14 | 17.00 | 0.76 | 1.61 | 1.76 |

TSP wear was reported in each of the four steam generators. A total of 131 TSP wear indications were detected. The maximum reported TSP wear depth was 17%TW.

4.1.2 Primary Side Visual Examination

Remote visual examinations of the primary channel heads in each steam generator were performed to the NSAL 12-1 requirements. No degradation of the cladding, welds, or structures was identified within the channel heads, and no foreign objects were identified. SG-A primary nozzle inside radius inspection did not identify any indications. No plug deficiencies were identified.

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4.2 Secondary Side Inspections

The planned FOSAR (annulus, no-tube lane, and inner bundle passes) examinations were performed in each of the four SGs following water lancing. No foreign objects were detected. Visual inspections of the steam drums in SG-A and SG-D were performed as planned.

4.2.1 Steam Drum Inspections

Secondary side inspections were performed in the steam drums of SG-A and SG-D. No loose parts or loose hardware was detected in either SG.

4.2.2 Sludge Lancing

Sludge Lancing was performed on all 4 steam generators. A combined total of 25.5 pounds of sludge was collected by AREVA. The steam generator tubes and the top of tubesheet were clean, with exception of a small sludge pile located near the center of each steam generator's top of tubesheet.

Table 6
RF21 Sludge Lancing Results

| | SGA | SGB | SGC | SGD | TOTAL |
|-----------------------------|------------|------------|-------------|------------|--------------|
| Sludge Removed (lbs) | 6 | 3 | 10.5 | 6 | 25.5 |

4.3 Condition Monitoring

The Condition Monitoring report concluded that the Callaway steam generator tubes satisfied the structural integrity performance, accident-induced leakage and operational leakage performance criteria in accordance with Technical Specifications 5.5.9, 3.4.13 and 3.4.17. Callaway did not perform any tube pulls or in-situ testing.