

January 25, 2019

ULNRC-06479

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

10 CFR 50.55a

Ladies and Gentlemen:

**DOCKET NUMBER 50-483**  
**CALLAWAY PLANT UNIT 1**  
**UNION ELECTRIC CO.**  
**RENEWED FACILITY OPERATING LICENSE NPF-30**  
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO RELIEF**  
**REQUEST 14R-05 FOR RELIEF FROM REQUIREMENTS OF ASME CODE CASE N-770-2**  
**REGARDING INSPECTION INTERVALS FOR**  
**REACTOR VESSEL NOZZLE DISSIMILAR METAL WELDS**

- References:
1. Ameren Missouri letter ULNRC-06420, "Request I4R-05 for Relief from Requirements of ASME Code Case N-770-2 Regarding Inspection Intervals for Reactor Vessel Nozzle Dissimilar Metal Welds," dated April 9, 2018 (ADAMS Accession Number ML18099A120)
  2. NRC electronic correspondence, "Formal release of RAIs Ref: Callaway Relief Request EPID L-2018-LLR-0051," dated November 27, 2018 (ADAMS Accession Number ML18331A205)

In the letter identified as Reference 1, Union Electric Company (Ameren Missouri) submitted Relief Request I4R-05 to request relief from the inspection frequency requirements, as incorporated by reference in 10 CFR 50.55a(g)(6)(ii)(F), of ASME Code Case N-770-2, Inspection Item A-2, "Unmitigated butt weld at Hot Leg operating temperature  $\leq 625^{\circ}\text{F}$  ( $329^{\circ}\text{C}$ )," and Inspection Item B, "Unmitigated butt weld at Cold Leg operating temperature." Since the examination schedule of Code Case N-770-2 does not address the effects of Surface Stress Improvement by water-jet peening (as completed at Callaway Plant during Refuel 22 in the fall of 2017) as an alternative to the inspection frequency requirements therein, Ameren Missouri proposed that the inspections be conducted in accordance with the inspection requirements for Alloy 82/182 dissimilar metal welds mitigated by water-jet peening, based on Item L of Table 4-1 in MRP-335, Revision 3A, "Materials Reliability Program: Topical Report for Primary Water Stress Corrosion Cracking Mitigation by Surface Stress

Improvement,” (November 2016) on the basis that the proposed alternative provided an acceptable level of quality and safety.

From review of the Reference 1 submittal, the NRC staff issued per Reference 2 a request for additional information (RAI) regarding Relief Request I4R-05. This letter provides Ameren Missouri's response to the RAI. Specifically, Ameren Missouri's water-jet peening vendor has prepared responses to the RAI questions which are hereby provided in the enclosure to this letter.

This letter does not contain new commitments.

If there are any questions, please contact Mr. Tom Elwood at 314-225-1905.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon L. Abel", written in a cursive style.

Shannon L. Abel,  
Director, Engineering Design &  
Projects

JPK/

Enclosure: Attachment A – Mitsubishi Responses to NRC WJP RAIs

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