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April 25, 1994

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Senior Vice President  
Nuclear

U.S. Nuclear Regulatory Commission  
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ULNRC-2993

Gentlemen:

DOCKET NUMBER 50-483  
CALLAWAY PLANT  
ASME CODE CASE N-416-1

The American Society of Mechanical Engineers has submitted Code Case N-416-1 to the Nuclear Regulatory Commission for review and approval. Code Case N-416-1 is entitled "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding." Approval is hereby requested for use of the provisions of Code Case N-416-1 for ASME Class 3 systems. Approval for use on ASME Class 1 and Class 2 systems is excluded from this request, and is addressed on a separate letter (ULNRC-2992).

Approval is requested by October, 1994, to permit utilization during Callaway's next refueling outage (Spring 1995). The need for timely approval is a result of the upcoming implementation of numerous ASME Section XI repair and replacement activities at the Callaway Plant and the extensive cost and scheduling impacts associated with hydrostatic testing. Cost savings resulting from elimination of all Class 1, 2, and 3 repair/replacement hydrostatic tests are estimated at approximately \$225,000.00. Union Electric considers the alternative testing requirements proposed in the Code Case to constitute a reasonable, safe alternative to the existing hydrostatic testing requirements, and requests timely approval.

Very truly yours,

A handwritten signature in cursive script that reads "Donald F. Schnell".

Donald F. Schnell

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