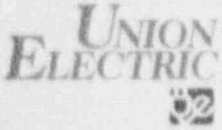


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Donald F. Schnell
Senior Vice President
Nuclear

July 19, 1991

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

ULNRC-2440

Gentlemen:

DOCKET NO. 50-483
CALLAWAY PLANT
ADDITIONAL INFORMATION CONCERNING THE
CALLAWAY PLANT INSERVICE INSPECTION PROGRAM PLAN

This letter transmits Relief Request Q to the Callaway Plant Inservice Inspection Program Plan. NRC staff approval of this submittal is requested by December 1, 1991 so that this inspection may be performed during the Refuel V outage which is scheduled to begin in March, 1992. A similar relief request has been approved for Wolf Creek Nuclear Operating Corporation.

If you have any questions concerning this letter, please contact us.

Very truly yours,

Donald F. Schnell

WEK/dls

Enclosure

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CALLAWAY ISI
RELIEF REQUEST Q

Component: 2RBB01-01, 02, 03, 04

Category: F-A

Description: Reactor Pressure Vessel Supports

Code Requirement: Section XI, Table IWF-2500-1, Item No. FI.40 requires a visual examination (VT-3) in accordance with the requirements of IWF-2510.

Basis for Relief: Complete examination of the NF portion of the above supports is hindered by high radiation, the insulation surrounding the reactor pressure vessel and the surrounding concrete structure. In order to visually examine these supports, the insulation and walk plates would have to be removed because no portion of the air cooled box and attachment bolting to the building structure is visible. Even after removing the insulation, only a limited portion of the welds on the air cooled box could be inspected. The bolting to the building structure would still be inaccessible. The radiation level in this area is greater than 1.5 R/hr. It is estimated that the removal and reinstallation of the insulation and walk plates, combined with the actual inspection of the accessible portion of the air cooled box, would result in approximately 36 man-rem exposure. Therefore, permanent relief is requested to only perform inspections on the visible portions of the supports without removal of the walk plates and insulation.

Alternate Examination: A visual inspection of the shoe assembly and wear plate will be performed to the maximum extent practical during the next refueling without removing the insulation and walk plates.

ASME Code Section III: Support shoes and air cooled box structures received MT or PT, UT and VT examinations prior to installation. The installation was also inspected to site quality control procedures.

Evaluation of Plant Safety: Stringent ASME Section III, Subsection NF quality assurance programs were utilized in the design, fabrication, and installation of these Class 1 components. Section III examinations confirmed support integrity during construction. The air cooled box, supporting the Reactor Pressure Vessel, is a rigid structure. The internal structural members with inaccessible welds are in compression. The absence of tensile or bending moment loads diminishes the importance of weld inspections. The main function of these welds is to hold the members in place rather than transfer direct loads to the building structure.

Based on the above, a satisfactory level of safety is provided without requiring complete examination of the NF portion of these supports. Any significant degradation to the support structures will be identified by the limited inspections, and appropriate corrective actions would then be taken to ensure structural integrity.

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 Senior 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. Schnell
Donald F. Schnell
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this 19th day
of July, 1991.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
ST. LOUIS COUNTY

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