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UNION ELECTRIC

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February 15, 1996

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

ULNRC-03334

Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT
ASME CODE CASE N-532

ASME Section XI Code Case N-532 is titled: "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000". This Code Case (Attachment 1) was approved by the American Society of Mechanical Engineers on December 12, 1994.

Code Case N-532 provides an alternative, simplified documentation method for ASME Section XI repairs and replacements. N-532 also provides an alternative, simplified reporting method for Inservice Inspection examination results. The alternatives provided by N-532 constitute significant reductions in the administrative burden associated with ASME Section XI repair and inspection activities. Concurrently, these alternatives increase the usability of reported data by excluding items of negligible plant safety significance.

One point of clarification is necessary regarding the term "corrective measures" as used in Code Case N-532. N-532 paragraph 2.0(c) states that an "Owners Activity Report Form OAR-1" shall contain an "abstract for repairs, replacements and corrective measures performed, which were required due to an item containing a flaw or relevant condition that exceeded (ASME Section XI) acceptance criteria....". ASME Section XI uses the term "corrective measures" in two different ways. In its first usage, "corrective measures" refers to ASME Section XI repair and replacement activities;

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i.e., activities on pressure-retaining items which involve metal removal, welding, brazing, or replacement. In its second usage, "corrective measures" refers to maintenance-type activities not involving Section XI repair or replacement (Ref. IWX-3000). Examples of maintenance-type corrective measures include but are not limited to tightening bolts, replacing gaskets/packing, cleaning up surface corrosion products and adjusting/realigning component supports. While maintenance-type corrective measures often serve to bring an item into compliance with ASME Code acceptance criteria, the corrective measures themselves are not ASME Section XI repair or replacement activities. Maintenance-type corrective measures are not currently reported on ASME Section XI summary reports and are of negligible safety significance. Union Electric Company considers the term "corrective measures" as used in N-532 to invoke reporting requirements consistent with those currently imposed by ASME Section XI. Maintenance-type corrective measures will, therefore, be excluded from the OAR-1 Form required by N-532.

NRC Policy Issue letter SECY-94-093 (dated May 10, 1995) documents NRC endorsement of the philosophy embodied in Code Case N-532. Page 6 of SECY-94-093 states:

> "Since the ASME Code is endorsed by NRC regulations (see 10 CFR 50.55a), the NRC will take a proactive role through its representatives on the ASME Code Committee to modify code reporting requirements to reduce licensee burden; in particular, the NRC will propose to eliminate the need to submit inservice inspection (ISI) reports to the NRC following each refueling outage (ASME Code Section XI, Article IWA-6000)."

Union Electric Company has been involved in the development and approval of Code Case N-532 through participation in the ASME Code Committee process. The cost effective alternatives provided by the Code Case are considered to be reasonable, safe alternatives to current Code requirements. Cost savings resulting from implementation of this Code Case are estimated at $20,000 per refueling cycle, therefore, this request is considered to be a Cost Beneficial Licensing Action.

This request for approval to use Code Case N-532 is submitted in accordance with 10CFR50.55(a) footnote 6, which states that:

> "The use of other Code Cases may be authorized by the Director of the Office of Nuclear Reactor Regulation upon request pursuant to 10CFR50.55(a)(3)."

Pursuant to this requirement, it is requested that the NRC approve ASME Code Case N-532 for use at the Callaway Nuclear Plant. Approval with the aforementioned clarification of the term "corrective measures", is requested by July 1, 1996 to support the refueling outage scheduled to begin in October 1996.

Very truly yours,

Donald F. Schnell

CDN/sld
Attachment

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Approval Date: December 12, 1994

See Numeric Index for expiration and any reaffirmation dates.

Case N-532

Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000[1]

Section XI, Division 1

Inquiry: What alternatives may be used to the requirements of IWA-4910(d) and IWA-6210(e) for completion of Form NIS-2 following repair or replacement, and IWA-6210(c) and (d), IWA-6220, IWA-6230(b), (c), and (d), and IWA-6240(b) for preparation and submittal of the inservice summary report and Form NIS-1?

Reply: It is the opinion of the Committee that as an alternative to the requirements of IWA-4910(d), IWA-6210(c), (d), and (e), IWA-6220, IWA-6230(b), (c), and (d), and IWA-6240(b), the following provisions may be used. This Case shall be utilized at least until the end of the inspection period in which it was invoked.

1.0 CERTIFICATION OF THE REPAIR OR REPLACEMENT

(a) The Owner's Repair/Replacement Program shall identify use of this Case.

(b) A Repair/Replacement Plan shall be prepared in accordance with IWA-4140[1], and shall be given a unique identification number.

(c) Upon completion of all required activities associated with the Repair/Replacement Plan, the Owner shall prepare a REPAIR/REPLACEMENT CERTIFICATION RECORD, FORM NIS-2A.

(d) Form NIS-2A shall be presented to the Inspector for certification.

(e) The completed Form NIS-2A shall be maintained by the Owner.

(f) The Owner shall maintain an index of Repair/Replacement Plans in accordance with IWA-6340. The index shall identify the identification number required by (b) above and the inspection interval and period during which each repair or replacement was completed.

2.0 OWNER'S ACTIVITY REPORT PREPARATION AND SUBMITTAL

An OWNER'S ACTIVITY REPORT FORM OAR-1 shall be prepared and certified upon completion of each refueling outage. Each Form OAR-1 prepared during an inspection period shall be submitted following the end of the inspection period. Each Form OAR-1 shall contain the following:

(a) Abstract of applicable examinations and tests with the information and format of Table 1.

(b) A listing of item(s) with flaws or relevant conditions that required evaluation to determine acceptability for continued service, whether or not the flaw or relevant condition was discovered during a scheduled examination or test. The listing shall provide the information in the format of Table 2.

(c) Abstract for repairs, replacements and corrective measures performed, which were required due to an item containing a flaw or relevant condition that exceeded IWB-3000, IWC-3000, IWD-3000, IWE-3000, IWF-3000, or IWL-3000 acceptance criteria; even though the discovery of the flaw or relevant condition that necessitated the repair, replacement or corrective measure, may not have resulted from an examination or test required by this Division. If acceptance criteria for a particular item is not specified in this Division, the provisions of IWA-3100(b) shall be used to determine which repairs, replacements, and corrective measures are required to be included in the abstract. The abstract shall provide the information in the format of Table 3.

[1]All references to IWA-4000 and IWA-6000 used in this Case refer to the 1992 Edition.

FORM NIS-2A REPAIR/REPLACEMENT CERTIFICATION RECORD

OWNER'S CERTIFICATE OF CONFORMANCE

I certify that the _____ represent by Repair/Replacement
repair or replacement

Plan number _____ conforms to the requirements of Section XI.

Type Code Symbol Stamp _____

Certificate of Authorization No. _____ Expiration Date _____

Signed _____ Date _____
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____ have inspected the items described in Repair/Replacement Plan number _____ during the period _____ to _____, and state that to the best of my knowledge and belief, the Owner has performed all the activities described in the Repair/Replacement Plan in accordance with the requirements of Section XI.

By signing this certificate neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the activities described in the Repair/Replacement Plan. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or loss of any kind arising from or connected with this inspection.

_____ Commissions _____
Inspector's Signature National Board, State, Province, and Endorsements

Date _____

This form (E00126) may be obtained from the Order Dept., ASME, 22 Law Drive, Box 2300, Fairfield, NJ 07007-2300.

FORM OAR-1 OWNER'S ACTIVITY REPORT

Report Number _____

Owner _____
(Name and Address of Owner)

Plant _____
(Name and Address of Plant)

Unit No. _____ (If applicable) Commercial service date _____ Refueling outage no. _____

Current inspection interval _____
(1st, 2nd, 3rd, 4th, other)

Current inspection period _____
(1st, 2nd, 3rd)

Edition and Addenda of Section XI applicable to the inspection plan _____

Date and revision of inspection plan _____

Edition and Addenda of Section XI applicable to repairs and replacements, if different than the inspection plan _____

_____

CERTIFICATE OF CONFORMANCE

I certify that the statements made in this Owner's Activity Report are correct, and that the examinations, tests, repairs, replacements, evaluations, and corrective measures represented by this report conform to the requirements of Section XI.

Certificate of Authorization No. _____ (If applicable) Expiration Date _____

Signed _____ Date _____
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____ have inspected the items described in this Owner's Activity Report, during the period _____ to _____ and state that to the best of my knowledge and belief, the Owner has performed all activities represented by this report in accordance with the requirements of Section XI.

By signing this certificate neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the examinations, tests, repairs, replacements, evaluations and corrective measures described this report. Furthermore, neither the Inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

_____ Commissions _____
Inspector's Signature National Board, State, Province, and Endorsements

Date _____

This form (E00127) may be obtained from the Order Dept., ASME, 22 Law Drive, Box 2300, Fairfield, NJ 07007-2300.

TABLE 1
ABSTRACT OF EXAMINATIONS AND TESTS

Examination Category	Total Examinations Required for The Interval	Total Examinations Credited for This Period	Total Examinations Credited (%) For The Period	Total Examinations Credited (%) To Date for The Interval	Remarks

TABLE 2
ITEMS WITH FLAWS OR RELEVANT CONDITIONS THAT REQUIRED EVALUATION FOR CONTINUED SERVICE

Examination Category	Item Number	Item Description	Flaw Characterization (IWA-3300)	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes or No)

TABLE 3
ABSTRACT OF REPAIRS, REPLACEMENTS, OR CORRECTIVE MEASURES REQUIRED FOR CONTINUED SERVICE

Code Class	Repair, Replacement, or Corrective Measure	Item Description	Description of Work	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes/No)	Date Complete	Repair/ Replacement Plan Number