



Donald F. Schnell
Senior Vice President
Nuclear

September 18, 1996

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20553-0001

Gentlemen:

ULNRC-3443

CALLAWAY PLANT
DOCKET NUMBER 50-483
REQUEST FOR ALTERNATIVE EXAMINATION REQUIREMENTS FOR
THE CALLAWAY PLANT INSERVICE INSPECTION PROGRAM PLAN

Reference: W. H. Bateman ltr to D. F. Schnell
dated September 12, 1996

ASME Section XI Code Case N-533 is entitled:
"Alternative Requirements for VT-2 Visual Examination
of Class 1 Insulated Pressure-Retaining Bolted
Connections." This Code Case (Attachment 1) was
approved by the American Society of Mechanical
Engineers on March 14, 1995.

Code Case N-533 provides alternative
requirements to be used in lieu of those of IWA-
5242(a) for the removal of insulation from pressure-
retaining bolted connections to perform a VT-2 visual
examination. Insulation removal and inspection of
components at a system operating temperature of 557 °F
is a personnel safety hazard.

This request for approval to use Code Case
N-533 is submitted in accordance with 10CFR50.55a
footnote 6, which states:

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

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In accordance with this requirement, it is requested that the NRC approve ASME Code Case N-533 for use at the Callaway Nuclear Plant. Approval is requested by October 1, to support the upcoming refueling outage scheduled to begin October 11, 1996.

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

Very truly yours,

A handwritten signature in cursive script, reading "Donald F. Schnell".

Donald F. Schnell

MMR/

Attachment

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 eighteenth day
of September, 1996.

Barbara J. Pfafe
BARBARA J. PFAFE
NOTARY PUBLIC - STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
ST. LOUIS COUNTY

cc: M. H. Fletcher
Professional Nuclear Consulting, Inc.
19041 Raines Drive
Derwood, MD 20855-2432

L. Joe Callan
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, TX 76011-8064

Senior Resident Inspector
Callaway Resident Office
U.S. Nuclear Regulatory Commission
8201 NRC Road
Steedman, MO 65077

Kristine M. Thomas (2)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
1 White Flint, North, Mail Stop 13E16
11555 Rockville Pike
Rockville, MD 20852-2738

Manager, Electric Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

**CASE
N-533****CASES OF ASME BOILER AND PRESSURE VESSEL CODE**

Approval Date: March 14, 1995

*See Numerical Index for expiration
and any reaffirmation dates.*

Case N-533**Alternative Requirements for VT-2 Visual
Examination of Class 1 Insulated Pressure-
Retaining Bolted Connections
Section XI, Division 1**

Inquiry: What alternative requirements may be used in lieu of those of IWA-5242(a) to remove insulation from Class 1 pressure-retaining bolted connections to perform a VT-2 visual examination?

Reply: It is the opinion of the Committee that, as an alternative to the requirements of IWA-5242(a) to remove insulation from Class 1 pressure-retaining bolted connections to perform a VT-2 visual examination, the following requirements shall be met.

(a) A system pressure test and VT-2 visual examination shall be performed each refueling outage without removal of insulation.

(b) Each refueling outage the insulation shall be removed from the bolted connection, and a VT-2 visual examination shall be performed. The connection is not required to be pressurized. Any evidence of leakage shall be evaluated in accordance with IWA-5250.