



February 27, 1997

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

ULNRC-03538

Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
FACILITY OPERATING LICENSE NPF-30
Proposed Generic Communication; Effectiveness of Ultrasonic Testing Systems in
Inservice Inspection Programs, (61 Fed. Reg. 69120-December 31, 1996 and 62 Fed.
Reg. 3064-January 21, 1997) Notice of Opportunity for Public Comment**

This letter details Union Electric's comments on the subject of the NRC's proposed Generic Letter on the "Effectiveness of Ultrasonic Testing Systems in Inservice Inspection Programs." Union Electric believes that the NRC has not adequately justified the request for licensee actions cited in the proposed Generic Letter for the following reasons:

- The proposed Generic Letter requests licensees to implement a performance based ultrasonic test qualification program similar to Appendix VIII, even though Appendix VIII has not been incorporated into the regulations. The letter places the licensee in a position of justifying not responding in the preferred manner rather than the NRC justifying the backfit of Appendix VIII. This implies that the proposed Generic Letter is not a request to comply with Appendix VIII, but a requirement to comply.
- The use of the 10 CFR 50.109(a)(4)(i) compliance exemption is inappropriate, since the proposed generic letter relies on a new regulatory position as to what constitutes compliance. Therefore, a backfit analysis per 10 CFR 50.109(a)(3) should be performed by NRC.
- The change to the performance based qualification program directed by the proposed generic letter would result in licensees violating the ASME rules specified by the

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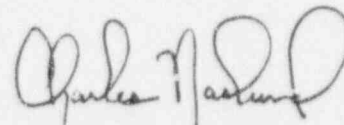


edition and addenda currently committed to as required by 10 CFR 50.55a unless a 10 CFR 50.55a(a)(3) alternative is approved by the NRC.

Union Electric Company supports the letter submitted by David J. Modeen of the Nuclear Energy Institute (NEI) dated February 21, 1997, on the subject of the NRC's proposed Generic Letter on the "Effectiveness of Ultrasonic Testing Systems in Inservice Inspection Programs", with one exception. Implementation of Performance Demonstration Initiative (PDI) methods in their entirety is impractical due to technical and programmatic inconsistencies that still need to be rectified.

Failure of PDI to address single-sided weld examination, cumbersome provisions for the addition of new technology to the essential variable list, a lack of PDI qualified examiners, and the inordinate cost of qualifying personnel and equipment to PDI, are issues that still need to be resolved. Therefore, voluntary implementation of selected portions of PDI is the only practical approach available to utilities if the NRC requires compliance with Appendix VIII

If you have any questions concerning this letter, please contact Mathew Rice, Callaway Plant Inservice Inspection Engineer at (573) 676-8539.



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