From:	Mahesh Chawla
Sent:	Tuesday, January 21, 2025 6:46 PM
To:	Elwood, Thomas B
Cc:	Dennis Galvin; Tony Nakanishi; Ami Agrawal; Matthew Mitchell; John Honcharik; Nathan Brown; Scott Schwind (He/Him); Michael Bloodgood; James Drake; Greg Warnick
Subject:	L-2024-LLR-0084 - Callaway - Draft Supplemental Information Request
Attachments:	L-2024-LLR-0084 - Callaway - Supplemental Information Request - Draft for Callaway.pdf

Dear Mr. Elwood,

By letter dated December 19, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24354A196), Union Electric Company, doing business as Ameren Missouri (the licensee), submitted proposed alternatives to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," regarding (1) the pneumatic leakage test requirement in subsection IWE-5221(a) (Proposed Alternative IWE-01) and (2) the pre-weld surface examination requirement of subsection IWA-4422.2.2(a) (Proposed Alternative IWE-02) for Callaway Plant, Unit No. 1 (Callaway). IWE-5221(a) requires the performance of a pneumatic leakage test per IWE-5223 or, alternatively, a bubble test-vacuum box technique per IWE-5224, following a weld repair activity prior to returning the component to service. IWA-4422.2.2(a), requires the performance of a surface examination of the defect removal area prior to welding. During the Callaway 2023 fall refueling outage, the licensee performed a weld repair of the metal containment liner without performing the ASME Code requirements in the subsection specified above (non-compliance ASME weld repair). The licensee proposed alternative is for the NRC retroactive authorization of the non-compliance ASME weld repairs during the Callaway 2023 fall refueling outage. The licensee requests that the proposed alternatives to remain in effect until (1) the end of the Callaway 2025 spring refueling outage (Proposed Alternative IWE-01) and (2) the end of plant life (Proposed Alternative IWE-02), respectively.

The NRC staff has reviewed your application and concluded that the information delineated in the draft attachment is necessary to enable the NRC staff to make an independent assessment regarding the acceptability of the proposed alternative in terms of regulatory requirements for the protection of public health and safety and the environment.

The NRC staff recommends the holding of a public meeting to discuss potential modified information necessary for proposed alternatives that would be submitted in response to this request for supplemental information. Thanks

Mahesh(Mac) Chawla, Project Manager
Licensing Branch LPL4
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Email Number: 2703

Mail Envelope Properties (SJ0PR09MB104050BC433D6DD06FEB00BE7F1E62)

Subject: L-2024-LLR-0084 - Callaway - Draft Supplemental Information Request
Sent Date: 1/21/2025 6:46:16 PM
Received Date: 1/21/2025 6:46:00 PM
From: Mahesh Chawla

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Tracking Status: None

Post Office: SJ0PR09MB10405.namprd09.prod.outlook.com

Files	**Size**	**Date & Time**
MESSAGE	2489	1/21/2025 6:46:00 PM
L-2024-LLR-0084 - Callaway - Supplemental Information Request - Draft for Callaway.pdf	176884	

Options
Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:

DRAFT

SUPPLEMENTAL INFORMATION NEEDED

PROPOSED ALTERNATIVES TO CERTAIN ASME CODE, SECTION XI, REQUIREMENTS

FOR CONTAINMENT LINER REPAIRS

UNION ELECTRIC COMPANY

CALLAWAY PLANT, UNIT 1

DOCKET NOS. 50-483

By letter dated December 19, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24354A196), Union Electric Company, doing business as Ameren Missouri (the licensee), submitted proposed alternatives to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," regarding (1) the pneumatic leakage test requirement in subsection IWE-5221(a) (Proposed Alternative IWE-01) and (2) the pre-weld surface examination requirement of subsection IWA-4422.2.2(a) (Proposed Alternative IWE-02) for Callaway Plant, Unit No. 1 (Callaway). IWE-5221(a) requires the performance of a pneumatic leakage test per IWE-5223 or, alternatively, a bubble test-vacuum box technique per IWE-5224, following a weld repair activity prior to returning the component to service. IWA-4422.2.2(a), requires the performance of a surface examination of the defect removal area prior to welding. During the Callaway 2023 fall refueling outage, the licensee performed a weld repair of the metal containment liner without performing the ASME Code requirements in the subsection specified above (non-compliance ASME weld repair). The licensee proposed alternative is for the NRC retroactive authorization of the non-compliance ASME weld repairs during the Callaway 2023 fall refueling outage. The licensee requests that the proposed alternatives to remain in effect until (1) the end of the Callaway 2025 spring refueling outage (Proposed Alternative IWE-01) and (2) the end of plant life (Proposed Alternative IWE-02), respectively.

Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(z) requires in part that a proposed alternative must be submitted and authorized prior to implementation. The regulations do not provide for the retroactive authorization of implemented proposed alternatives. Since, the licensee has requested retroactive authorization to implement the alternatives for the non-compliance ASME Code weld repair performed during the Callaway 2023 fall refueling outage, the NRC staff does not have the authority to authorize Proposed Alternatives IWE-01 and IWE-02 as proposed. The licensee should revise the proposed alternatives to propose alternatives for future activities to bring the repair into compliance with the ASME Code, and not propose alternatives for the non-compliance of IWE-5221(a) and IWA-4422.2.2(a) in the ASME Code during the Callaway 2023 fall refueling outage.

The NRC staff recommends the holding of a public meeting to discuss potential modified information necessary for proposed alternatives that would be submitted in response to this request for supplemental information.

Enclosure