

NRR-PMDAPem Resource

From: Klos, John
Sent: Tuesday, June 07, 2016 7:22 AM
To: 'Telwood@ameren.com'
Cc: Klos, John; Rezai, Ali
Subject: RAI: Callaway MF6729 Relief Request N-460 issued with 30 day response time

Mr. Elwood,

By letter dated September 14, 2015 (Accession Number ML15258A432), Union Electric Company (the licensee), requested relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV Code) related to ASME Code Case N-460 "Alternative Examination Coverage for Class 1 and Class 2 Welds, Section XI, Division 1" and piping weld examination coverage at the Callaway Plant. Unit 1.

The Nuclear Regulatory Commission (NRC) staff has been reviewing the submittals and has determined that requests for additional information (RAIs) are needed to complete its technical review and make a regulatory finding regarding this LAR. The draft questions were sent via electronic transmission on May 26, 2016 to Mr. Tom Elwood and it was later determined that a clarification call was not necessary. Additionally, it was agreed that a response would be submitted within 30 calendar days from the date of this email, on July 7, 2016.

REQUEST FOR ADDITIONAL INFORMATION
RELIEF REQUEST I3R-08 REGARDING WELD EXAMINATION COVERAGE
UNION ELECTRIC COMPANY
CALLAWAY PLANT, UNIT 1
DOCKET NUMBER 50-483

Background:

By letter dated September 14, 2015 (Accession Number ML15258A432), Union Electric Company (the licensee), requested relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV Code) related to ASME Code Case N-460 "Alternative Examination Coverage for Class 1 and Class 2 Welds, Section XI, Division 1" and piping weld examination coverage at the Callaway Plant. Unit 1.

Regulatory Basis:

ISI of ASME Code Class 1, 2, and 3 components is to be performed in accordance with Section XI of the ASME Code and applicable addenda as a way to detect anomaly and degradation indications so that structural integrity of these components can be maintained. This is required by 10 CFR 50.55a(g), except where specific relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). Section 10 CFR 50.55a(g)(5)(iii) states that the licensee must notify the U.S. Nuclear Regulatory Commission (NRC) and submit information to support its determinations that conforming with an ASME Code requirement is impractical for its facility. Determinations of impracticality in accordance with this section must be based on the demonstrated limitations experienced when attempting to comply with the Code requirements during the ISI interval for which the request is being submitted.

Pursuant to 10 CFR 50.55a(g)(4), components (including supports) that are classified as ASME Code Class 1, Class 2, and Class 3 must meet the requirements, except design and access provisions and preservice

examination requirements, set forth in Section XI of editions and addenda of the ASME Code, that become effective subsequent to editions specified in paragraphs (g)(2) and (3) of this section, to the extent practical within the limitations of design, geometry, and materials of construction of the components.

Requests:

To complete its review, the U. S. Nuclear Regulatory Commission (NRC) staff requests the following additional information.

1. Table 1 of the relief request states that the material listed is austenitic stainless steel. It is unclear if the pipe is austenitic stainless steel. Please also confirm that the weld material and the associated components (valve, elbow, tee, and flange) of Table 1 are austenitic stainless steel. If valve, elbow, tee, and flange are cast austenitic stainless steel, please describe.
2. Provide ASME Code classification (e.g., Class 1 or 2), operating pressure, and temperature for each weld.
3. Confirm that the welds under consideration are not part of an augmented inspection program such as ASME Code Case N-770-1, MRP-146, and/or the Electric Power Research Institute (EPRI) interim guidance MRP 2015-025 "EPRI-MRP Interim Guidance for Management of Thermal Fatigue" (Accession Number ML15189A100). If these welds are part of an augmented program, please describe.
4. For the welds in Table 1 listed as being subject to thermal fatigue, were there other welds composed of the same materials and subject to similar environmental conditions which were examined. If so, please describe these examinations and their results.
5. For the welds in Table 1 listed as being subject to thermal fatigue, are there additional welds composed of the same materials and subject to the similar environmental conditions which could be examined in the future to provide additional inspection coverage should the NRC staff determine that the coverage achieved for the welds under consideration is not adequate.

John Klos

DORL Callaway, Columbia Project Manager

U.S. NRC, Office of Nuclear Reactor Regulation,

Division of Operating Reactor Licensing, O8E7

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From: Klos, John

Created By: John.Klos@nrc.gov

Recipients:

"Klos, John" <John.Klos@nrc.gov>

Tracking Status: None

"Rezai, Ali" <Ali.Rezai@nrc.gov>

Tracking Status: None

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