

November 13, 2002

Mr. Garry L. Randolph
Vice President and Chief Nuclear Officer
Union Electric Company
P.O. Box 620
Fulton, MO 65251

SUBJECT: CALLAWAY PLANT, UNIT 1 - RESPONSE TO NRC BULLETIN 2002-02,
"REACTOR PRESSURE VESSEL HEAD AND VESSEL HEAD PENETRATION
NOZZLE INSPECTION PROGRAMS" (TAC NO. MB5878)

Dear Mr. Randolph:

On August 9, 2002, the U.S. Nuclear Regulatory Commission (NRC) issued Bulletin 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs." The Bulletin requested addressees to provide information related to their reactor pressure vessel (RPV) head and vessel head penetration (VHP) nozzle inspection programs for their respective facilities, including a summary discussion of inspection program plans to supplement their required visual inspections with non-visual nondestructive examination methods, or justification for reliance on visual examinations as the primary method to detect degradation. Addressees were requested to respond to Item 1 of the Bulletin within 30 days of its issuance, or within 15 days of its issuance, to provide an alternative course of action, including the basis for acceptability of the proposed action.

By letter dated September 11, 2002 (ULNRC-04731), you provided a response to Item 1 of the Bulletin, providing your plans to perform RPV head and VHP nozzle inspections at the Callaway Plant. The response also indicated that the plant is in the category of plants considered to have low susceptibility to RPV head and VHP cracking, based on a susceptibility ranking of less than 8 effective degradation years (EDY). Specifically, you stated that Callaway had approximately 2.5 EDY, in accordance with the Electric Power Research Institute (EPRI) Materials Reliability Program (MRP) Report MRP-48.

The NRC staff has reviewed your response to Item 1 of the Bulletin. In that response, you stated that your immediate inspection plan is to perform a 100% bare metal visual examination of the RPV head (i.e., 100% of the carbon steel surface and 100% of the interface area between the head penetrations and the carbon steel on top of the head) during refueling outage No. 12. The staff finds that this inspection plan is adequate for providing reasonable assurance that existing regulatory requirements are met.

The staff notes that your justification for reliance on visual examinations and long-term inspection plans relies on the EPRI MRP inspection plan for pressurized water reactor RPV upper head penetrations. The staff has not completed its review of the MRP inspection plan and, as such, has not made a determination on the adequacy of the program for ensuring applicable regulatory requirements are met. Therefore, the staff's assessment of your justification and the adequacy of your long-term inspection program plans will be determined upon completion of the staff's review of the MRP proposed inspection plan.

Mr. Garry L. Randolph

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Also, as stated in Item 2 of the Bulletin, you are requested to report to the Commission your inspection scope and results within 30 days after plant restart following the inspection of the RPV head and VHP nozzles.

If you have any questions on this issue or this letter, contact me at (301) 415-1307.

Sincerely,

/RA/

Jack Donohew, Senior Project Manager, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-483

cc: See next page

Mr. Garry L. Randolph

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Callaway Plant, Unit 1

cc:

Professional Nuclear
Consulting, Inc.
19041 Raines Drive
Derwood, MD 20855

John O'Neill, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

Mr. Mark A. Reidmeyer, Regional
Regulatory Affairs Supervisor
Regulatory Affairs
AmerenUE
P.O. Box 620
Fulton, MO 65251

U.S. Nuclear Regulatory Commission
Resident Inspector Office
8201 NRC Road
Steedman, MO 65077-1302

Mr. J. V. Laux, Manager
Quality Assurance
AmerenUE
P.O. Box 620
Fulton, MO 65251

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

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavilion
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Mr. Ronald A. Kucera, Deputy Director
for Public Policy
Department of Natural Resources
205 Jefferson Street
Jefferson City, MO 65101

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, KA 66839

Mr. Dan I. Bolef, President
Kay Drey, Representative
Board of Directors Coalition
for the Environment
6267 Delmar Boulevard
University City, MO 63130

Mr. Lee Fritz
Presiding Commissioner
Callaway County Court House
10 East Fifth Street
Fulton, MO 65151

Mr. David E. Shafer
Superintendent Licensing
Regulatory Affairs
AmerenUE
P.O. Box 66149, MC 470
St. Louis, MO 63166-6149

Mr. John D. Blosser, Manager
Regulatory Affairs
AmerenUE
P.O. Box 620
Fulton, MO 65251

Mr. Scott Clardy, Director
Section for Environmental Public Health
P.O. Box 570
Jefferson City, Missouri 65102-0570