

July 14, 2005

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

ULNRC-05170

Ladies and Gentlemen:



**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
AUTHORIZATION FOR USE OF DELTA PROTECTION
RESPIRATORY PROTECTION EQUIPMENT**

Reference: ULNRC-05152, dated June 1, 2005

This letter provides additional information, as requested on June 23, 2005, regarding the Union Electric Company (AmerenUE) request for authorization to use the Delta Protection French designed respiratory equipment with an assigned protection factor (APF). The AmerenUE request for approval and exemption from the requirements of 10 CFR 20.1703 and 10 CFR 20 Appendix A was previously provided in the above reference. Enclosed is a detailed response to the NRC request for additional information (RAI).

Regulatory commitments contained in this letter are identified in Enclosure 2.

If you have any questions regarding this submittal, please contact me at (573) 676-8659 or Mr. Dave Shafer, Superintendent – Licensing at (314) 554-3104.

Sincerely,

A handwritten signature in cursive script that reads "Keith D. Young".

Keith D. Young
Manager - Regulatory Affairs

BFH/

Enclosure:	1	Exemption / Approval Request
	2	List of Commitments

AOO1

ULNRC-05170

July 14, 2005

Page 2

cc: U.S. Nuclear Regulatory Commission (Original and 1 copy)
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

Mr. Bruce S. Mallett
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

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

Mr. Jack N. Donohew (2 copies)
Licensing Project Manager, Callaway Plant
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Mail Stop 7E1
Washington, DC 20555-2738

Missouri Public Service Commission
Governor Office Building
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
AUTHORIZATION FOR USE OF DELTA PROTECTION
RESPIRATORY PROTECTION EQUIPMENT**

Question 1.

Verify that the licensee has committed to timely reporting of any defects experienced with these suits to other U.S. users.

Response

As stated in section 2.3.4 of enclosure 1 to ULNRC-005152, AmerenUE will use the Callaway Corrective Action Request System (CARS) to document any unexpected problems and track corrective actions taken. Problems associated with the suits will be communicated to the manufacturer to ensure that operating experience is shared with other users.

In addition, if significant usage problems are identified, AmerenUE will enter these problems into an Operating Experience Report issued to the nuclear power industry via the INPO Nuclear Network.

Question 2.

Verify that the licensee will not use the suits in environments that are immediate dangerous to life and health (IDLH).

Response

The Mururoa V4 F1 and V4 MTH2 suit design does not permit its use in an immediately dangerous to life and health (IDLH) atmosphere. AmerenUE will use this suit for protection against radioactive particulate contamination only in environments that are not immediately dangerous to life and health (IDLH) atmosphere.

Question 3.

While the licensee has committed to develop implementing procedures (and training lesson plans) for using the suits, identify any of the manufacturer's technical information (i.e., Instructions For Use) and directions provided, that will not be required by procedures. For each instruction identified, explain the rationale for not including it in the program's procedures/training (and any other compensating actions).

Response

AmerenUE intends to adhere to the manufacturer's "instructions for donning and removal", "instructions for use", and "emergency features" technical information/directions provided for the Mururoa V4 F1 and V4 MTH2 suits with the following exception. Under the "Dressing" section of the instruction, the manufacturer describes performing a visual inspection before removing the shipping

protection (cardboard on the visor and inside the garment, and removable "plastic protection" from the visor). AmerenUE proposes to perform a visual inspection of the garment and its components after the shipping protection material (cardboard and plastic protection) have been removed. This will allow removing the shipping protection material outside of a contaminated area and thus reduce potential radioactive waste. According to the manufacturer's representative, both the cardboard and the plastic are used to maintain the integrity of the visor during transit and storage.

Question 4.

Data supplied for the Mururoa V4 F1 and V4 MTH2 suits demonstrates a fit factor greater than 50,000. Since the request for authorization is separated for Mururoa BLU and V4 type models, verify that protection factor 2000 and not 5000 is applied for Mururoa V4 F1 and V4 MTH2 suits.

Response

Since the authorization is being separated for the two suit types, AmerenUE requests that an Assigned Protection Factor (APF) of 5000 be approved for the Mururoa V4 F1 and V4 MTH2 suits. For the Mururoa BLU suits, the original requested APF of 2000 is acceptable for our projected needs.

LIST OF COMMITMENTS

The following table identifies those actions committed to by AmerenUE in this document. Any other statements in this document are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to Mr. David E. Shafer at (314) 554-3104.

COMMITMENT	Due Date/Event
Procedural guidance will be established to ensure AmerenUE identified significant defects and usage problems are enter into an Operating Experience Report issued to the nuclear power industry via the INPO Nuclear Network.	Within 45 days of NRC approval