

June 1, 2006

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
11555 Rockville Pike  
Rockville, MD 20852

Ladies and Gentlemen:

ULNRC-05294



**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
UNION ELECTRIC CO.  
60-DAY RESPONSE TO NRC GENERIC LETTER 2006-03,  
"POTENTIALLY NONCONFORMING HEMYC AND MT FIRE  
BARRIER CONFIGURATIONS"**

NRC Generic Letter (GL) 2006-03, "Potentially Nonconforming Hemyc and MT Fire Barrier Configurations," dated April 10, 2006, was issued to request information from licensees regarding Hemyc and MT fire barriers, or other fire barriers using the materials and configurations described in the generic letter.

GL 2006-03 requested that all addressees provide a response that contains the following information:

1. *Within 60 days of the date of this GL, provide the following:*
  - a. *A statement on whether Hemyc or MT fire barrier material is used at their NPPs and whether it is relied upon for separation and/or safe shutdown purposes in accordance with the licensing basis, including whether Hemyc or MT is credited in other analyses (e.g., exemptions, license amendments, GL 86-10 analyses).*
  - b. *A description of the controls that were used to ensure that other fire barrier types relied on for separation of redundant trains located in a single fire area are capable of providing the necessary level of protection. Addressees may reference their responses to GL 92-08 to the extent that the responses address this specific issue.*

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2. *Within 60 days of the date of this GL, for those addressees that have installed Hemyc or MT fire barrier materials, discuss the following in detail:*
  - a. *The extent of the installation (e.g., linear feet of wrap, areas installed, systems protected),*
  - b. *Whether the Hemyc and/or MT installed in their plants is conforming with their licensing basis in light of recent findings, and if these recent findings do not apply, why not,*
  - c. *The compensatory measures that have been implemented to provide protection and maintain the safe shutdown function of affected areas of the plant in light of the recent findings associated with Hemyc and MT installations, including evaluations to support the addressees' conclusions, and*
  - d. *A description of, and implementation schedules for, corrective actions, including a description of any licensing actions or exemption requests needed to support changes to the plant licensing basis.*
3. *No later than December 1, 2007, addressees that identified in 1.a. Hemyc and/or MT configurations are requested to provide a description of actions taken to resolve the nonconforming conditions described in 2.d.*

Callaway Plant does not use Hemyc or MT fire barrier materials for fire barrier separation of redundant trains located in a single fire area.

Callaway Plant utilizes Darmatt-KM-1 as raceway fire barrier protection for redundant trains located in the same fire area that satisfies 10 CFR 50, Appendix R, III, G requirements.

Callaway Plant also has one location that utilizes Silicone RTV foam as fire stops for intervening non-safety related cable trays located within a 20 foot separation zone. Callaway committed to the installation of these fire stops during the construction phase. These fire stops were reviewed and found acceptable in NUREG 0830, Safety Evaluation Report related to the operation of Callaway Plant Unit No. 1, Supplement 3.

Installation and inspection procedures verified that the barrier products were installed in a manner consistent with the testing and analyses to ensure test configurations and criteria would be bounding to the installed configurations. Deviations from the tested configurations were evaluated and provide reasonable assurance that the installed fire barrier systems would provide the necessary level of protection.

ULNRC-05294

June 1, 2006

Page 3

AmerenUE inspects fire barriers every 18 months to ensure ongoing integrity.

Test reports, previous correspondence, and additional information are available on site.

Requests for information 2 and 3 do not apply to Callaway Plant.

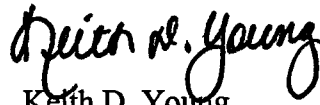
In accordance with the provisions of Section 182a of the Atomic Energy Act of 1954, as amended, and 10 CFR 50.54(f), AmerenUE is submitting this letter under oath and affirmation, as clarified in Regulatory Issue Summary (RIS) 2001-18, "Requirements for Oath or Affirmation."

This letter does not contain any commitments. If you have questions regarding this response, please contact D. E. Shafer at 314-554-3104.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Executed on June 1, 2006

  
Keith D. Young  
Manager - Regulatory Affairs

PMB/jdg

ULNRC-05294

June 1, 2006

Page 4

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