

October 10, 2006

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

Ladies and Gentlemen:

ULNRC-05334



**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
REQUEST FOR AUTHORIZATION FOR USE OF
DELTA PROTECTION MURUROA BLU SINGLE-USE SUITS**

Pursuant to the provision of 10 CFR 20.1703, "Use of Individual Respiratory Protection Equipment," and 10 CFR 20.1705, "Application for Use of Higher Assigned Protection Factors," Union Electric Company (AmerenUE) requests authorization to use the French-designed Delta Protection Mururoa BLU respiratory protection suits described in "Topical Report of Delta Protection Mururoa BLU Suit System" (TR MURUBLU05NP).

AmerenUE commits to use the Delta Protection Mururoa BLU self-fed single-use suits consistent with "Topical Report of Delta Protection Mururoa BLU Suit System" (TR MURUBLU05NP) and to use the suits within the approved device configuration, limitations and conditions of use specified in Section 4.0 of the NRC Safety Evaluation dated April 10, 2006 for TR MURUBLU05NP (TAC NO. MC8994).

Approval of the request would improve worker safety in areas of airborne radioactivity and high potential for facial/skin contamination from hot particles. In addition, the full body cooling effect will help us eliminate concerns that have come up in the past outages regarding heat stress. This will result in reduced outage time, as well as the reduction of personal contamination events.

Enclosure 1 list AmerenUE's commitments supporting this request.

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Authorization to use these suits will allow AmerenUE to proceed with procedure changes and complete training necessary for the use of the Mururoa BLU suits prior to our next refueling outage. Therefore, AmerenUE is requesting NRC approval by February 1, 2007 in order to support use during the spring 2007 refueling outage.

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

Sincerely,


for Keith D. Young
Manager - Regulatory Affairs

BFH/jdg

Enclosure: 1. List of Commitments

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Mr. Ron Reynolds
Director
Missouri State Emergency Management Agency
P.O. Box 116
Jefferson City, MO 65102

LIST OF COMMITMENTS

The following table identifies the actions necessary to fulfill the commitment made in this letter to use the Delta Protection Mururoa BLU self-fed single use suits consistent with "Topical Report of Delta Protection Mururoa BLU Suit System" (TR MURUBLU05NP) and to use the suits within the device configuration, limitations and conditions of use stated in the Safety Evaluation, dated April 10, 2006 (TAC No. MC8994). 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
<p>The BLU suits will be used in a configuration consisting of: Mururoa BLU one-piece encapsulating suit (of either PVC or Ethyfuge construction), fitted with a Micronel C500X-012EK-AB60 blower with a C501A-012AK-A battery (consistent with the parts list in Section 7 of Attachment 6.6.6 to the Topical Report TR MURUBLU05NP (ADAMS Accession No. ML053060280) four Scott PF 10 P3, or four Delta Protection P3, high efficiency particulate filter cartridges. All four filter cartridges must be matching and replaced as a set.</p>	<p>Prior to placing the suit in service.</p>
<p>Procedures for use of the suit systems are integrated into the respiratory programs required by Subpart H of 10 CFR Part 20. Fit testing of user is not applicable to fully encapsulating suits. Prior to use, wearers are trained on these conditions of use as well as the emergency escape features of the suits.</p>	<p>Prior to placing the suit in service.</p>
<p>Suits are used in accordance with recommendations in Attachments 6.6.4, 6.6.5, and 6.6.6 of the Topical Report TR MURUBLU05NP (ADAMS Accession No. ML053060280)</p>	<p>Prior to placing the suit in service.</p>
<p>Suit enclosures are single use only, (other than those segregated for training purposes only) and are discarded after use. Unused suit enclosures are stored in their original manufacturer's packing (in an environment not colder than 32 deg. F, nor hotter than 140 deg. F), with a maximum storage shelf-life of 3 years. Suits are not to come in contact with anything colder than 41 deg. F, nor hotter than 140 deg. F, during use.</p>	<p>Prior to placing the suit in service.</p>

<p>Suits are donned with a fully charged battery pack installed on the blower. The maximum period of use (timed from a fully charged battery), is 4 hours with the blower set at 600 l/min, and 7 hours with the blower at the 400 l/min setting.</p>	<p>Prior to placing the suit in service.</p>
<p>Suits are used only in atmospheres containing specific contaminants in concentrations that are not immediately dangerous to life or health (IDLH), as given in NIOSH "Concept for Industrial Power, Air-purifying Respiratory Standard", Draft for Comment, May 30, 2005 (http://www.cdc.gov/niosh/npptl/standardsdev.html), and have an oxygen content of at least 19.5 percent by volume.</p>	<p>Prior to placing the suit in service.</p>
<p>Communication channels are established with Delta Protection to report any defects experienced with the device, and ensure that any manufacturer's notifications concerning the suit systems are received in a timely manner.</p>	<p>Prior to placing the suit in service.</p>
<p>The following elements and controls found in Section 6.4 of Topical Report TR MURUBLU05NP will be incorporated into Callaway's respiratory protection program:</p> <ol style="list-style-type: none">1. The Mururoa BLU self fed suits will be integrated into the respiratory protection program, using the information provided by the manufacturer.2. New lesson plans will be developed to train workers on Mururoa BLU's features, donning, use and removal, cautions and use of mouth strips and tear off strips for routine and emergency egress.3. Provide training to Radiation Protection personnel on selection, approval, issue, equipment set-up, operation and maintenance instructions for Mururoa BLU suits.	<p>Prior to placing the suit in service</p>

COMMITMENT REVISION, INITIATION, DELETION REQUEST (CRIDR)

ORIGINATOR		
1. Check the appropriate request: <input type="checkbox"/> Revision <input checked="" type="checkbox"/> Initiation <input type="checkbox"/> Deletion		
2. Name (print) <u>Brian Holderness</u>		3. Date <u>09/26/2006</u>
4. Commitment No. _____ (RRA will enter this in case of initiation)		
5. Source document, section, and date <u>ULNRC-05334</u>		
6. Reference documents, sections, and dates _____ (use attachments if necessary)		
7. Justification for revision, initiation, or deletion: (attach additional pages as required) <u>This letter identifies commitment to the NRC on actions AmerenUE will completed prior to use of the Delta suits once they are approved for use at Callaway.</u>		

CRITERIA FOR A COMMITMENT	
8. Place an 'x' by any of the following items that apply to the commitment text (initiation and revision only):	
a) <input checked="" type="checkbox"/>	It is a written promise by AmerenUE - Callaway Plant to the NRC to perform an action by a given date.
b) <input type="checkbox"/>	It is a written promise by AmerenUE - Callaway Plant to another regulatory agency to perform an action by a given date.
c) <input type="checkbox"/>	It is a written promise by AmerenUE - Callaway Plant to another entity to perform an action by a given date.
If none of the items can be marked, this text may not represent a commitment. In this case, contact RRA for further directions.	
9. Action Documents <u>various</u>	10. Recommended Responsible Person(s) <u>Johann Geyer</u>
11. Approving Manager <u>David A. Hefner 10/10/06</u>	

Forward CRIDR package to RRA	
12. Commitment coordinator _____	13. Date Entered CTS _____

Instructions	
1.-3.	Self explanatory
4.	Enter the number of the commitment being revised or deleted.
5.	Enter the title of the source document, the section of the source document that contains the commitment text, and the date the document was issued. The source document is the document in which AmerenUE commits an action to outside organizations.
6.	Enter the title of the source documents, the sections containing the reference text, and the date the documents were issued. Reference documents are any documents that contain redundant, similar, or supporting information with respect to the source text.
7.	Enter the reason for revising, initiating, or deleting this commitment.
8.	Select the applicable choice. If none apply, this may not be a commitment, but an obligation.
9.	Enter document(s) which satisfy the commitment (if known).
10.	Enter responsible person(s) (if known).
11.	Signature of the Approving manager

Return CRIDR to RRA	
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