AmerenUE
Callaway Plant

PO Box 620
Fulton, MO 65251

May 7, 2007

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

Ladies and Gentlemen: ULNRC-05415

DOCKET NO. 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
90 DAY RESPONSE TO NRC GENERIC LETTER 2007-01, INACCESSIBLE OR UNDERGROUND POWER CABLE FAILURES THAT DISABLE ACCIDENT MITIGATION SYSTEMS OR CAUSE PLANT TRANSIENTS

Pursuant to 10 CFR 50.54(f), this letter provides the Union Electric Company (AmerenUE) 90-day response to NRC Generic Letter 2007-01, "Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients." The generic letter requests licensees to provide a history of inaccessible or underground power cable failures and to describe inspection, testing and monitoring programs to detect the degradation of inaccessible or underground power cables for cables within the scope of 10 CFR 50.65.

There are no commitments made to the NRC by this letter. 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.

Very truly yours,

Executed on the 7th day of May, 2007.

David T. Fitzgerald
Manager - Regulatory Affairs

DS/jdg

Attachment: 90-day Response to Generic Letter 2007-01

A127

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 O-7D1
Washington, DC 20555-2738

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

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

bcc: C. D. Naslund
A. C. Heflin
D. T. Fitzgerald
G. A. Hughes
D. E. Shafer
S. L. Gallagher (100)
L. M. Belsky (NSRB)
K. A. Mills
P. M. Bell
A160.0761

Certrec Corporation
4200 South Hulen, Suite 422
Fort Worth, TX 76109

(Certrec receives ALL attachments as long as they are non-safeguards and public disclosed).

Send the following without attachments:

Ms. Diane M. Hooper
Supervisor, Licensing
WCNOC
P.O. Box 411
Burlington, KS 66839

Mr. Dennis Buschbaum
TXU Power
Comanche Peak SES
P.O. Box 1002
Glen Rose, TX 76043

Mr. Scott Bauer
Regulatory Affairs
Palo Verde NGS
P.O. Box 52034,
Mail Station 7636
Phoenix, AZ 85072-2034

Mr. Stan Ketelsen
Manager, Regulatory Services
Pacific Gas & Electric
Mail Stop 104/5/536
P.O. Box 56
Avila Beach, CA 93424

Mr. Scott Head
Supervisor, Licensing
South Texas Project NOC
Mail Code N5014
P.O. Box 289
Wadsworth, TX 77483

Mr. John O'Neill
Pillsbury Winthrop Shaw Pittman LLP
2300 N. Street N.W.
Washington, DC 20037

Response to Requested Information of NRC Generic Letter 2007-01, Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients

Below is the Union Electric Company (AmerenUE) response to the Requested Information of NRC Generic Letter 2007-01, "Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients." The generic letter's "Requested Information" is shown in bold followed by AmerenUE's response.

NRC Requested Information Item (1):

Provide a history of inaccessible or underground power cable failures for all cables that are within the scope of 10 CFR 50.65 (the Maintenance Rule) and for all voltage levels. Indicate the type, manufacturer, date of failure, type of service, voltage class, years of service, and the root causes for the failure.

AmerenUE Response (1):

Research into inaccessible or underground power cable failures at Callaway Plant revealed one failure in power cables within the scope of 10 CFR 50.65 in the voltage range between 480 VAC and 15,000 VAC. Table 1 contains the information requested as well as additional information on failure type, component supported and cable identifier.

NRC Requested Information Item (2):

Describe inspection, testing and monitoring programs to detect the degradation of inaccessible or underground power cables that support EDGs, offsite power, ESW, service water, component cooling water and other systems that are within the scope of 10 CFR 50.65 (the Maintenance Rule).

AmerenUE Response (2):

AmerenUE performs a limited amount of insulation resistance and polarization index testing on selected cables during routine motor circuit evaluation testing, overhaul or maintenance of the equipment they feed. AmerenUE has not implemented other inspection, testing or monitoring programs to detect the degradation of inaccessible or underground power cables.

AmerenUE performs the following actions on a routine basis to eliminate or minimize conditions known to impact cable degradation rates for cables that are within the scope of 10 CFR 50.65:

- Periodically perform visual inspection for corrosion and degradation of cable tray supports for selected cables.

- Periodically inspect and dewater selected manholes.

Table 1. AmerenUE Inaccessible or Underground Power Cable Failures

Failure #	Failure Type (inservice/ testing)	Cable Type (Insulation Type)	Cable Type (Shielded, Yes/No)	Cable Manufacturer	Date of Failure	Type of Service (energized/ deenergized)	Component Supported	Cable Identifier	Voltage Class (nominal service voltage)	Voltage Class (cable rating voltage)	Years of Service Prior to Failure	Root Causes for the Failure (apparent cause)
1	Inservice	Ethylene propylene insulation with Hypalon jacket	No	Anaconda (Durasheath EP)	Exact date unknown. Identified on 1/7/1990	Energized during low temperature operations only	UHS sump heater SEF02D	6EFG13PA	480V	600V	Approx 6 years	Unknown. Details are limited for this non-safety job. Failed cable suspected of being subjected to excessive strain during initial installation which led to eventual failure. Identical replacement cables in service for 17 years. Cause is unverified.