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UNION ELECTRIC COMPANY 1901 GRATIOT STREET ST. LOUIS, MISSOURI

DONALD F. SCHNELL

July 2, 1984

MAILING ADDRESS P. O. BOX 149 ST. LOUIS, MISSOURI 63166

Mr. James G. Keppler Regional Administrator USNRC Region III 799 Roosevelt Road Glen Ellyn, IL 60137

ULNRC- 858

OUL 9 1984

Dear Mr. Keppler:

AMENDMENT TO FINAL 10CFR50.55(e) REPORT U-72 PENETRATION SEAL INSTALLATION AND INSPECTION CALLAWAY PLANT

> Ref: 1) ULNRC-786 April 4, 1984 2) ULNRC-804 April 8, 1984

Reference 1, as amended by Reference 2, documents Union Electric's final 10CFR50.55(e) report submitted to NRC Region III regarding silicone foam penetration seals. In order to prevent separation between the foam and the penetrating items and/or penetration liner, the report stated:

"the time allowed for curing has been extended from one to seven days, an additional sealing caulk has been applied at the seal interface, and the inspectors have been retrained."

Subsequent to this report it has been necessary to modify the requirement for caulking penetrations which are located in the bottom of cabinets or boxed-in in such a manner that excess silicone overlaps the seal. Any separation that may occur at the edge of the excess silicone would not affect the function of the seal.

Furthermore, in several cases obstructions such as hangers block the top of the seal and prevent complete caulking. These penetrations are being caulked to the fullest extent. If separations occur under the obstruction, the gaps would be blocked and, therefore, not detrimental to the performance of the seal.

These actions meet the intent of the fire protection program and do not diminish the effectiveness of the seals.

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Very truly yours,

Donald F. Schnell

JJM/1kr

CC: W. L. Forney, NRC Region III Richard DeYoung, Director I&E Missouri Public Service Commission NRC Resident Inspectors, Callaway Plant (2)