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**UNION
ELECTRIC**



October 10, 1995

U.S. Nuclear Regulatory Commission
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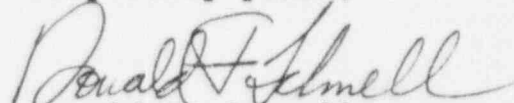
Gentlemen:

ULNRC-03277

CALLAWAY PLANT
DOCKET NUMBER 50-483
PRESSURE LOCKING AND THERMAL BINDING OF
SAFETY-RELATED POWER-OPERATED GATE VALVES
Reference: NRC GENERIC LETTER 95-07
dated August 17, 1995

The attachment to this letter contains Union Electric's response to NRC Generic Letter 95-07. If you have any questions concerning this information, please contact us.

Very truly yours,


Donald F. Schnell

WEK/jdg

Attachment (2 pages)

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STATE OF MISSOURI)
)
CITY OF ST. LOUIS) S S

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Senior Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell
Donald F. Schnell
Senior Vice President
Nuclear

SUBSCRIBED and sworn to before me this tenth day
of October, 1995.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC - STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
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UNION ELECTRIC RESPONSE TO
NRC GENERIC LETTER 95-07
PRESSURE LOCKING AND THERMAL BINDING OF
SAFETY-RELATED POWER-OPERATED GATE VALVES

Introduction

NRC Generic Letter 95-07, dated August 17, 1995, requires actions be taken by utilities in regard to the susceptibility of power-operated gate valves to pressure locking and thermal binding. The information contained herein addresses, for Callaway Plant, the 60 day response to Generic Letter 95-07.

Union Electric Assessment

Union Electric will implement the actions requested in Generic Letter 95-07. Within 90 days of the issuance of Generic Letter 95-07 (November 15, 1995), Union Electric will perform a screening evaluation to identify any safety-related power-operated gate valves which may be potentially susceptible to thermal binding or pressure locking. If any valves are identified as susceptible, the basis for operability and continued plant operation will be documented.

Within 180 days of the issuance of generic Letter 95-07 (February 13, 1996), Union Electric will evaluate the operational configurations of valves identified as susceptible to pressure locking or thermal binding. Additional analyses will be performed as appropriate, and corrective actions will be implemented to ensure all valves identified as susceptible are capable of performing their intended safety functions. A summary description will be provided for the following:

1. The susceptibility evaluation and any further analyses performed including the criteria for determining that valves are or are not susceptible to pressure locking or thermal binding.
2. The results of the susceptibility evaluation and any further analyses, including a listing of the susceptible valves.
3. The corrective actions for any valves identified as susceptible to pressure locking or thermal binding.

Union Electric has been aware of the potential for gate valves to pressure lock or thermally bind as early as December 1984 when SOER 84-07 was issued by INPO. Starting in September 1985, Union Electric has documented reviews of gate valves in service at the Callaway Plant for pressure locking and/or thermal binding in response to SOER 84-07,

SER 8-88, NRC Notice 92-26, NUREG-1275 Volume 9, NRC Notices 95-14 & 95-18, and NRC Temporary Instruction 2515/109. These reviews have been a continuous process, factoring in additional information as it has become available.

The reviews have not identified any valves at Callaway that, when required to perform their safety function, are susceptible to pressure locking or thermal binding. As new issues emerged, our ongoing reviews have included such items as valve design and setup, testing conditions, and procedural sequence of operation for each valve being evaluated. These existing reviews will be enhanced as appropriate to ensure all requirements of Generic Letter 95-07 are met.

Industry Activities

Union Electric is aware of the various industry efforts related to this issue. We are involved in the Westinghouse Owners Group project which will provide a standardized methodology to identify and address valves susceptible to pressure locking and thermal binding. We are also monitoring testing activities used by individual utilities. The data from these efforts will be evaluated for its applicability to the Callaway Plant and factored into our evaluations as the results become available.