

December 8, 1995



U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Donald F. Schnell
Senior Vice President
Nuclear

Gentlemen:

ULNRC-03302

DOCKET NUMBER 50-483
CALLAWAY PLANT
THERMO-LAG 330-1 FIRE BARRIERS

- Reference:
1. Request for Additional Information Regarding Generic Letter 92-08, dated October 23, 1995
 2. Follow-up to the Request for Additional Information regarding Generic Letter 92-08, dated September 19, 1994
 3. Follow-up to the Request for Additional Information Regarding Generic Letter 92-08, dated December 28, 1994
 4. ULNRC-3116, dated December 19, 1994
 5. ULNRC-3181, dated March 28, 1995
 6. ULNRC-3229, dated June 26, 1995

References 4, 5 and 6 provided Union Electric's responses to requests for additional information (PAI) regarding Generic Letter 92-08. Reference 1 requested Union Electric to provide additional information to fully address the questions raised in the RAIs concerning Union Electric's plans and schedule for resolution of the ampacity derating issues.

Union Electric hereby submits its 45 days response to the request for additional information regarding Generic Letter 92-08 issues that are related to ampacity derating.

Should you have any questions or need additional information concerning this matter please contact us.

Very truly yours,

A handwritten signature in cursive script that reads "Donald F. Schnell".

Donald F. Schnell

JMC/mlc
Attachment

1029

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

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he 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 eighth day
of December, 1995.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC - STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
ST. LOUIS COUNTY.

cc: T. A. Baxter, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, D.C. 20037

M. H. Fletcher
Professional Nuclear Consulting, Inc.
19041 Raines Drive
Derwood, MD 20855-2432

L. Joe Callan
Regional Administrator
U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 400
Arlington, TX 76011-8064

Senior Resident Inspector
Callaway Resident Office
U.S. Regulatory Commission
RR#1
Steedman, MO 65077

Kristine M. Thomas (2)
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
1 White Flint, North, Mail Stop 13E16
11555 Rockville Pike
Rockville, MD 20852-2738

Manager, Electric Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RESPONSE TO THE REQUEST FOR ADDITIONAL
INFORMATION REGARDING GENERIC LETTER 92-08

1. RAI of September 19, 1994

You are requested to submit your ampacity derating evaluations, including any applicable test reports, in order to provide an adequate response to Generic Letter 92-08 Reporting Requirement 2(-).

RESPONSE:

Reference 4 provided Union Electric's response to Item IV, Ampacity Derating items, as requested in Reference 2. This response relied on the development and utilization of NEI's test program for ampacity derating factors. As stated in your discussion in Reference 1, NEI is not presently pursuing a test program for ampacity derating factors. Therefore, Union Electric will resolve the ampacity derating issue as described below in the response to Item 2.

2. RAI OF December 28, 1994

You are requested to provide your site-specific schedule and plans for the resolution of the ampacity derating issue for Thermo-Lag fire barriers. If you expect to use an NEI test program or analysis, please provide specific program details and incorporate any input by NEI into your overall schedule. The staff expects that, in resolving fire endurance issues, you will submit the test procedures or, alternatively, describe the analytical methodology, including typical calculations, that will be used to determine the ampacity derating parameters for the Thermo-Lag fire barriers that are installed at the Callaway Plant.

RESPONSE:

References 4, 5 and 6 provided Union Electric's responses to Ampacity Derating issues as requested by Item IV and Item 1a(8) in References 2 and 3, respectively. These responses relied on the development and utilization of NEI's test program for ampacity derating factors. As stated above NEI is not presently pursuing a test program for ampacity derating factors. Therefore, Union Electric will resolve the ampacity derating issue as follows:

Union Electric's plan for resolution of Generic Letter 92-08 ampacity derating issues will encompass an analytical methodology to establish and assess ampacity derating factors for Thermo-Lag fire barriers installed on cable trays and conduits. A comparison of these analytical ampacity derating factors to industry (i.e. TU and TVA) ampacity derating testing results will be included, where applicable, to ensure conservative analytical ampacity derating factors. The results of this plan for resolution of Generic Letter 92-08 ampacity derating issues are scheduled to be completed by April 30, 1996.