

**UNION
ELECTRIC**

April 15, 1993

Donald F. Schnell
Senior Vice President
Nuclear

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

ULNRC-2792

Gentlemen:

DOCKET NUMBER 50-483

CALLAWAY PLANT

THERMO-LAG 330-1 FIRE BARRIERS

Reference: NRC Generic Letter 92-08, dated
December 17, 1992

NRC Generic Letter 92-08, Reporting Requirement 1 requests Licensees to state whether Thermo-Lag 330-1 barriers are relied upon (a) to meet 10 CFR 50.48, to achieve physical independence of electrical systems, (b) to meet a condition of a plant's operating license, or (c) to satisfy a licensing commitment. Callaway Plant uses Thermo-Lag 330-1 barriers to meet conditions of the plant's operating license and to satisfy licensing commitments including 10 CFR 50, Appendix A, General Design Criteria 3 to ensure safe shutdown capability in the event of a fire and to achieve physical independence of electrical systems. Both 1-hour and 3-hour applications of Thermo-Lag materials are utilized by assembling preformed panels and conduit shapes, as well as trowel-on applications.

Reporting Requirement 2(a) requests Licensees to state whether or not they have qualified the Thermo-Lag 330-1 fire barriers by conducting fire endurance tests in accordance with the NRC's requirements and guidance or licensing commitments. All of the fire endurance tests used to qualify the Thermo-Lag 330-1 fire barriers installed at Callaway Plant were performed by Industrial Testing Laboratories, Inc. (ITL). These tests have been classified as "indeterminate" by the NRC in Information Notice (IN) 92-46, "Thermo-Lag Fire Barrier Material Special Review Team Findings, current Fire Endurance Tests, and Ampacity Calculations and Errors," dated June 23, 1992.

Reporting Requirement 2(b) requests Licensees state (1) whether or not the barrier configurations installed in the plant represent the materials, workmanship, methods of assembly, dimensions, and configurations of the qualification test assembly configurations; and (2) whether or not the licensee has

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evaluated any deviations from the tested configurations. As stated in the response to Item 2.a above, the qualification fire endurance tests have been classified by the NRC as "indeterminate" in IN 92-46. Callaway Plant has not evaluated any deviations from the tested configurations.

Reporting Requirement 2(c) requests Licensees state (1) whether or not the as-built Thermo-Lag 330-1 barrier configurations are consistent with the barrier configurations used during the ampacity derating tests relied upon by the licensee for the ampacity derating factors used for all raceways protected by Thermo-Lag 330-1 (for fire protection of safe shutdown capability or to achieve physical independence of electrical systems) and (2) whether or not the ampacity derating tests results relied upon by the licensees are correct and applicable to the plant design. The ampacity derating factors used by Callaway Plant were provided by Thermal Sciences, Inc. NRC IN 92-46 classifies the ampacity derating factors for the Thermo-Lag 330-1 fire barrier system as "indeterminate".

With respect to any answer to items 2(a), 2(b), or 2(c) above in the negative, Reporting Requirement 3 requests Licensees (a) describe all corrective actions needed and include a schedule by which such actions shall be completed and (b) describe all compensatory measures taken in accordance with the technical specifications or administrative controls. Reporting Requirement 3 also requests Licensees confirm in writing when corrective actions have been completed. Callaway Plant is participating in the NUMARC industry Thermo-Lag program. This program is intended to provide generic fire endurance and ampacity testing and to provide information necessary to accomplish corrective actions. The Callaway Plant schedule by which such corrective actions will be completed will parallel the specific schedules provided to the NRC by NUMARC. When corrective actions are completed, Callaway Plant will confirm to the NRC in writing their completion. All compensatory measures taken in accordance with Callaway Plant administrative controls for inoperable Thermo-Lag fire barriers have been provided to the NRC in ULNRC-2704, dated September 30, 1992 in response to NRC Bulletin 92-01, Supplement 1, dated August 28, 1992.

If you have any questions concerning this matter, please contact me.

Very truly yours,



Donald F. Schnell

STATE OF MISSOURI)
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CITY OF ST. LOUIS)

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 15th day
of April, 1993.

Barbara J. Peaff
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NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
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