

UNION ELECTRIC COMPANY

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ST. LOUIS, MISSOURI

DONALD F. SCHNELL  
VICE PRESIDENT

May 14, 1984

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Mr. James G. Keppler  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

ULNRC- 821

Dear Mr. Keppler:

IE BULLETIN 79-14: SEISMIC ANALYSIS FOR  
AS-BUILT SAFETY-RELATED PIPING SYSTEMS  
CALLAWAY PLANT

Ref: SLNRC 79-18, dated November 1, 1979

The referenced letter provided the SNUPPS response to the subject IE Bulletin. The purpose of this letter is to provide the status of our IE Bulletin 79-14 program.

Bechtel Power Corporation was contracted by Union Electric to conduct the required walkdowns and reviews. Bechtel has completed the initial walkdown of all piping and hangers within the scope of IE Bulletin 79-14 and has issued punch lists of findings identified during this process.

The Bechtel findings were grouped as follows: Group 1 includes all items which pertain to the physical installation of piping and hangers. Group 2 includes items pertaining to installation of insulation, coping of insulation at interferences, heat tracing installation and verification of penetration closure installation.

All items in Group 1 will be closed with completion of ASME Code N-5 data reports. Close-out of Group 2 items is coordinated with completion of insulation, heat tracing, and penetration closures.

The reference letter indicated that our IE Bulletin 79-14 program would be completed by plant fuel load. At the time of that planning, late 1979, the many interfaces and details of inspection requirements were not well understood. Completion of insulation, heat tracing, and penetration closures are among the final construction activities at Callaway. This work will not be completed prior to fuel load.

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We will verify that final installation of insulation, heat tracing, and penetration closures is compatible with seismic evaluations and stress analyses. However, the very nature of this work, coupled with our plans for final installation, should preclude any effect on the validity of seismic and stress analyses. Items which are more likely to have an effect, i.e. the physical installation of piping and hangers, will be completed prior to fuel load. It is Union Electric's judgment that completion of 79-14 items which do not impact configuration of piping and hangers after fuel load will not compromise plant safety.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Donald F. Schnell". The signature is fluid and cursive, with the first name "Donald" being more prominent.

Dona. F. Schnell

RLS/jm

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