



March 28, 1995

Donald F. Schnell
Senior Vice President
Nuclear

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

ULNRC-03181

Gentlemen:

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

- Reference: 1. Follow-up to the Request for Additional Information Regarding Generic Letter 92-08 Issued Pursuant to 10CFR50.54(f), dated December 28, 1994
2. ULNRC-2955, dated February 10, 1994
3. ULNRC-3116, dated December 19, 1994


References 2 and 3 provided Union Electric's responses to a request for additional information and a follow-up to the request for additional information regarding Generic Letter 92-08. Reference 1 requests Licensees to provide additional follow-up information to that provided in their previous responses as specified in the enclosure in Sections 1.a, 1.b, 1.c, 2.a, 2.b and 2.c.

Union Electric hereby submits its 90-day response to the follow-up request for additional information regarding Generic Letter 92-08, "Thermo-Lag 330-1 Fire Barriers", pursuant to 10CFR50.54(f). The response in Attachment 1 addresses the enclosure sections. We are, however, requesting a 90-day extension for providing a final response to Items 1.a(3) through 1.a(9), 1.b, 1.c, 2.b and 2.c. This is necessary in order to obtain results from the industry wide test program to determine Thermo-Lag material consistency. The completion schedule for the written supplemental reports requested in Items 1.d, and 2.d will also be provided in our next submittal.

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

Very truly yours,

A handwritten signature in cursive script, reading "Donald F. Schnell". The signature is written in dark ink and is positioned above the printed name.

Donald F. Schnell

JMC/sld
Attachment

STATE OF MISSOURI)
) S S
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 28th day
of March, 1995.

Barbara J. Pfaff
BARBARA J. PFAFF
NOTARY PUBLIC -- STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1997
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E210.01

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A160.412 (92-08)

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

Union Electric is cooperating with industry efforts to resolve the issues of Generic Letter 92-08. To this end, four samples of Thermo-Lag 330-1 were shipped to NUCON International Inc., for pyrolysis gas chromatography (PGC) testing in accordance with the guidance of ASTM D3452. This testing is pursuant to the industry-wide testing program requested by NEI.

A copy of the test results will be provided to NEI for inclusion in a generic data pool which will be available to the industry and NRC. Since PGC testing has already been performed by NUCON on 18 Thermo-Lag 330-1 samples taken from three utilities and from NEI stocks, and no significant variations were noted, we expect that the test program will provide reasonable assurance of Thermo-Lag material consistency at Callaway and the industry. Pending assessment of data gathered under the industry-wide test program, we do not believe it necessary to perform any additional chemical composition testing at this time.

Union Electric has joined the Electric Power Research Institute (EPRI) Tailored Collaboration (TC) effort as part of its resolution of Thermo-Lag issues. Preliminary work by Science Applications International Corporation (SAIC), the lead consultant for the EPRI TC effort, indicates that there are only 3 parameters important to the qualification of Thermo-Lag fire barriers. These are:

- Raceway size
- Baseline fire barrier thickness
- Band/wire spacing

The data required to demonstrate baseline fire barrier thickness and band/wire spacing will be obtained as needed to support the TC analysis in accordance with the Thermo-Lag resolution schedule contained in Attachment 5 to Reference 3. This timeline schedule currently shows completion of the Thermo-Lag resolution effort by the end of December 1996.

Since neither the TC calculations nor the chemical test results from the industry-wide testing program have been completed, final resolution of the items specified in the enclosure in Sections 1.a, 1.b, 1.c, 2.a, 2.b and 2.c cannot be determined at this time. This makes it necessary to request a 90-day extension for providing a final response. Our response will be provided by June 26, 1995.