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Donald F. Schnell
Senior Vice President
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September 30, 1992

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

ULNRC-2704

DOCKET NUMBER 50-483
CALLAWAY PLANT
FAILURE OF THERMO-LAG 330 FIRE BARRIER SYSTEM
TO PERFORM ITS SPECIFIED FIRE ENDURANCE FUNCTION

- References:
- 1) NRC Bulletin No. 92-01,
dated June 24, 1992
 - 2) NRC Bulletin No. 92-01,
Supplement 1, dated
August 28, 1992
 - 3) ULNRC-2673, dated
July 23, 1992

Reference 1 requested Licensees to identify areas of the plant which have Thermo-Lag 330 fire barrier material installed for protecting either small diameter conduit or wide trays that provide safe shutdown capability. In our response (Reference 3) we stated that Callaway Plant has Thermo-Lag 330 fire barrier systems installed on 43 conduits (4" diameter or smaller), 10 junction boxes, and 2 cable trays (24" in width).

In Reference 2, Action Item 1, NRC requests Licensees to expand the scope of the Thermo-Lag 330 survey to identify all sizes of conduits and trays, and to include walls, ceilings, and equipment enclosures. In response to this supplement, we note that Thermo-Lag 330 is also installed on a valve enclosure, 6 hatch covers, and in 3 cable tray fire stops.

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In summary, Thermo-Lag 330 is installed on approximately 700 feet of conduit, 30 feet of tray, and 400 square feet of hatch covers and valve enclosures. The material is located in the following plant areas: Auxiliary Building Rooms 1127, 1203, 1206, 1207, 1301, 1304, 1314, 1315, 1323, 1325, 1331, 1406, 1408, 1410, and 1504; Reactor Building elevation 2026'-0" (Fire Area RB-4) and Elevation 2047'-0" (Fire Area RB-10); and Control Building Rooms 3101 and 3401.

Action Item 2 of Supplement 1 requests that Licensees implement, in accordance with plant procedures, the appropriate compensatory measures, such as fire watches, consistent with those which would be implemented by either the plant technical specifications or the operating license for an inoperable fire barrier. Licensees who have installed Thermo-Lag 330 fire barriers were requested to inform the NRC, in writing, within 30 days of receiving Supplement 1, whether they had taken the above actions and to describe the measures being taken to ensure or restore fire barrier operability.

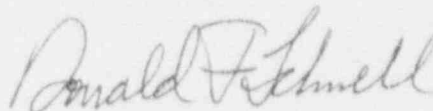
At Callaway Plant an hourly fire watch has been established in all affected rooms outside of the Reactor Building, in accordance with plant procedures for an inoperable fire barrier. In the Reactor Building, air temperature is monitored per plant procedures. We note that Thermo-Lag installed in the Reactor Building is a radiant energy heat shield per 10 CFR Part 50 Appendix R and is not considered a fire barrier.

These compensatory measures will remain in place until appropriate actions to restore fire barrier operability are developed through an industry program coordinated by NUMARC. This program will include establishment of a test database, development of guidance for applicability of tests, development of generic installation guidance, and consideration and coordination of additional testing as appropriate. We expect that at Callaway Plant, one of the following measures will be taken to ensure or restore the Thermo-Lag fire barrier operability: 1) justify the barrier as-installed; 2) upgrade the barrier to

new test/installation criteria; 3) replace the barrier with another approved fire barrier material; or 4) eliminate the need for the barrier by re-routing electrical circuits.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "Donald F. Schnell".

Donald F. Schnell

JMC/kea

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 30th day
of September, 1992.

Barbara J. Peffer
BARBARA J. PEFFER
NOTARY PUBLIC, STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 22, 1993
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/QA Record (CA-758)

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