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Reg Guide

Secretary of the Commission,
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: Comments on USNRC Draft Regulatory Guide,
Dated July 1979, Division 1, Task RS 809-5,
" Qualification Test for Cable Penetration
Fire Stops Used in Nuclear Power Plants"



Nuclear Services Corporation has comments to offer on the proposed regulatory guide which pertains to IEEE Standard 634-1978, "IEEE Standard Cable Penetration Fire Stop Qualification Test." These comments are as follows:

1. Section C2c, Page 3. It is not clear what a typical termination device would consist of. It would normally be interpreted to mean terminal strips; however, it could be interpreted that the device itself is required to be there during the test.
2. Section C3, Page 3, Second Sentence, Fifth Line. Starting with the word "unless".... it is restored to the original design configuration which was successfully tested under similar conditions. Deleting the word its prototype, adding an additional sentence at the end of this which says: For penetrations which do not meet this criteria, requalification test must be performed.
3. Section C8, Page 4. We feel that the maximum temperature of 400° is overly restricting to the design of fire stop penetrations. This is based upon the poor housekeeping practice of possibly having cardboard shipping containers near the floor penetration. The cardboard box would require the maintenance of 400° to 600° for many more than three hours before self ignition could occur. Also, we do not feel the regulatory guide should attempt to address housekeeping problems when it is discussing the design of fire stop penetrations.

We recognize that these comments are being issued on the date set by the USNRC for receipt of comments. We hope that these comments will still be useful.

Very truly yours,

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