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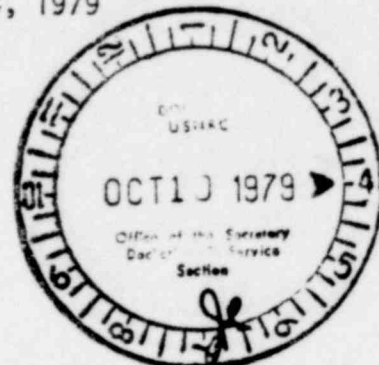
PR - *Miss Notice*
Reg Guide

September 24, 1979

Mr. Samuel J. Chilk
Secretary of the Commission
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Docketing and Service Branch

Gentlemen:



COMMENT ON DRAFT REGULATORY GUIDE
QUALIFICATION TEST FOR CABLE PENETRATION FIRE STOPS

In July 1979, the NRC published for comment a draft Regulatory Guide (Task RS 809-5) entitled, "Qualification Test for Cable Penetration Fire Stops for Use in Nuclear Power Plants". Wisconsin Electric Power Company's fire protection officer has reviewed this draft Guide and has provided the following brief comments.

The differential pressure requirement for cable penetration seal qualification is inappropriate. Many approved seal designs are already in place without this requirement and fire barriers are not subjected to differential pressure for rating. The differential pressure requirement has been debated by seal test experts for the past several years. This test technique is very difficult to achieve and since little is known or documented about the actual magnitude of developed pressure in fire situations, this qualification requirement should be deleted from the Guide.

Similarly, the requirement to test a seal which has been modified and repaired seems excessive and unwarranted. The ASTM rating test for fire barriers does not require that the test specimen have a repaired section. If these requirements are applied to the cable penetration seals, then, all fire barrier should be tested with a repaired section included in the specimen.

Thank you for this opportunity to provide these comments on the subject proposed Guide.

Very truly yours,

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C. W. Fay, Director
Nuclear Power Department

Acknowledged by card

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