

Omaha Public Power District
1623 Harney Omaha, Nebraska 68102-2247
402/536-4000

June 22, 1990
LIC-90-0515

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-157
Washington, DC 20555

References: 1. Docket No. 50-285
2. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk) dated February 21, 1990 (LIC-89-1203)

Gentlemen:

SUBJECT: Additional Information on Exemption Request for Fire Area 34B

In Reference 2, Omaha Public Power District (OPPD) submitted a request for exemption from certain requirements of 10 CFR Part 50, Appendix R, regarding the configuration of the wide range nuclear instrumentation cables in Fire Area 34B (upper electrical penetration room). This exemption is based upon the extremely low probability of a fire damaging all four nuclear instrumentation channels at once. Such a fire is improbable due to limited combustibles, physical separation, and area-wide detection allow prompt manual suppression of any fire that would occur. Emergency boration is an added aid to achieving and maintaining safe shutdown if a fire would occur in Fire Area 34B.

In Paragraph B.(4) of OPPD's exemption request, OPPD stated that "actions described in...Abnormal Operating Procedures (AOPs) required to maintain safe shutdown of the plant will not be negatively affected by the potential loss of core monitoring capability due to a fire in the upper electrical penetration room". NRC reviewers questioned whether existing AOPs require sampling to verify boron concentration. Applicable AOPs and EOPs to this scenario do not require sampling for boron concentration. Procedures direct plant operators to trip the reactor and to emergency borate using the boric acid storage tanks and, if necessary, switch to the Safety Injection Refueling Water Tank (SIRWT) as a source of boric acid. Emergency boration would continue until the calculated shutdown margin, based on the quantity of boric acid injected into the Reactor Coolant System (RCS), meets applicable requirements.

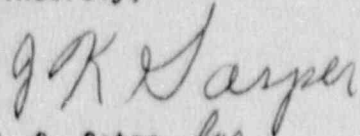
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LIC-90-0516
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OPPD, therefore, respectfully requests that the NRC continue processing the Exemption Request for Fire Area 34B as submitted in Reference 2. If you should have any questions, please contact me.

Sincerely,



W. G. Gates *for*
Division Manager
Nuclear Operations

WGG/sel

c: LeBoeuf, Lamb, Leiby & MacRae
A. Bournia, NRC Project Manager
R. D. Martin, NRC Regional Administrator, Region IV
P. H. Harrell, NRC Senior Resident Inspector