Omaha Public Power District 444 South 16th Street Mall Omaha, Nebraska 68102-2247 402/636-2000

January 14, 1991 LIC-91-0022

U. S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Station P1-137 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)
	3.	Letter from NRC (A. Bournia) to OPPD (W. G. Gates) dated November 14, 1990

Gentlemen:

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SUBJECT: Response to Denial of Exemption Request for Fire Area 34B

This letter provides the response required by Reference 3 which denied Omaha Public Power District's (OPPD's) exemption request from the requirements of 10 CFR 50, Appendix R for Fire Area 34B (Upper Electrical Penetration Room).

NRC reviewers concluded that an equivalent level of protection to that required by Appendix R, Section III.G.2 was not being provided for Fire Area 34B, thus the NRC denied OPPD's exemption request for this area.

OPPD evaluated this issue and will pursue a modification to reconcile this condition. A modification request has been initiated to address wide-range nuclear instrumentation (NI) cable proximity. Two options for this modification are presently being investigated: (1) physically relocating the cabling associated with one channel of wide-range NI or (2) providing protection in the form of a one-hour fire wrap for one channel of wide-range NI. Implementation of option (2) will require the need for an exemption from Appendix R, Section III.6.2 based on the lack of fixed suppression.

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OPPD will respond by March 31, 1991 with a schedule for implementation of the modification. Until such time as the modification is performed, appropriate compensatory measures will remain in effect, per the Safety Analysis for Operation (SAO 90-13).

If you should have any questions, please contact me.

Sincerely,

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W. G. Gates Division Manager Nuclear Operations

WGG/sel

c: LeBoeuf, Lamb, Leiby & MacRae
R. D. Martin, NRC Regional Administrator, Region IV
W. C. Walker, NRC Project Manager
R. P. Mullikin, NRC Senior Resident Inspector