

Omaha Public Power District
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August 5, 1992
LIC-92-217R

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Washington, DC 20555

- References:
1. Docket No. 50-285
 2. Letter from OPPD (R. L. Andrews) to NRC (J. R. Miller) dated January 9, 1985 (LIC-84-338)
 3. Letter from NRC (E. J. Butcher) to OPPD (R. L. Andrews) dated July 3, 1985
 4. Letter from OPPD (R. L. Andrews) to NRC (A. C. Thadani) dated April 9, 1986 (LIC-86-118)
 5. Letter from NRC (D. E. Sells) to OPPD (R. L. Andrews) dated July 1, 1986

Gentlemen:

SUBJECT: Clarification of 10 CFR Part 50, Appendix R Exemption Request for Fort Calhoun Station (FCS) Fire Area 34A (Lower Electrical Penetration Area)

During a recent review of FCS Appendix R documentation, a discrepancy was discovered in the NRC Safety Evaluation Report (SER) (Reference 5) concerning the routing of power feeder cables in Fire Area 34A for certain redundant motor control centers (MCCs). As a result, OPPD is submitting this letter to clarify the manner in which 10 CFR Part 50, Appendix R, Section III.G requirements are met for power feeder cables located in Fire Area 34A. The history of this issue is as follows.

In Reference 2, OPPD revised a 1953 exemption request to indicate that power feeder cables located in Fire Area 34A for certain redundant MCCs would be rerouted inside the room in steel conduits and protected by a 1-hour fire-rated barrier. The NRC granted the OPPD exemption request in an SER dated July 3, 1985 (Reference 3). In Reference 4, OPPD modified the above commitment for Fire Area 34A by stating: "Field inspection, however, indicated a better routing for these cables which required no conduit in the fire area of concern." As the intent of this statement was unclear, the cable configuration was misinterpreted in the subsequent SER (Reference 5), which stated: "... the licensee indicated that these cables have been rerouted outside of the fire area."

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The intent of the statement from Reference 4 was to indicate that the installation of additional conduit inside of Fire Area 34A was unnecessary, not that the power feeder cables had been rerouted outside of Fire Area 34A. As noted in Reference 4, Modification MR-FC-85-25 installed a 1-hour fire-rated wrap throughout Fire Area 34A on cable free-drops, cable trays and conduit containing the rerouted power feeder cables. This configuration provides protection equivalent to the requirements of 10 CFR Part 50, Appendix R, Section III.G and is also consistent with the bases for the original SER (Reference 3). OPPD requests that the NRC supplement the SER of Reference 5 acknowledging the acceptability of the 1-hour fire-rated wrap currently installed on the power feeder cables located in Fire Area 34A.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Division Manager
Nuclear Operations

WGG/sel

c: LeBoeuf, Lamb, Leiby & MacRae
J. L. Milhoan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Acting Project Manager