

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

May 2, 1988
LIC-88-296

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

- References: 1. Docket No. 50-285
2. Letter from OPPD (R. L. Andrews) to NRC (R. D. Martin) dated March 18, 1988 (LIC-88-191)

Gentlemen:

SUBJECT: Internal Sealing of Conduits

In Reference 2, Omaha Public Power District (OPPD) committed to clarify its position with respect to the internal sealing of conduits at the Fort Calhoun Station.

The first concern was the interpretation of the submittal OPPD made in 1978 regarding the original fire barrier penetration sealing program, done under contract by Chemtrol Corporation. The submittal stated that small openings inside of conduit should be sealed with RTV caulk. The NRC interpreted this statement to mean that OPPD was going to seal conduits internally. OPPD's interpretation, which agreed with the vendor's, was that this was a material specification if the inside of conduits were to be sealed. OPPD used an in-house criteria for sealing conduits internally such that any conduit that was open ended and did not extend into the fire area at least ten feet should be sealed. The sealing was accomplished using the fire stop RTV foam.

The second NRC concern was that some of the conduits at Fort Calhoun were sealed to a revision of the original sealing criteria. This required that conduits larger than two inch nominal size and extending less than five feet into the fire area be sealed regardless of whether or not they were open ended. OPPD stated that it appeared that the revised criteria resulted from a misinterpretation of the criteria the NRC had published in NUREG-0800, issued at about the same time the revised criteria was adopted. In order to provide a technical basis for sealing criteria, OPPD has purchased the WEPCO conduit sealing study which was performed by PLC and adopted the criteria developed from that study. By purchasing this criteria, OPPD requests to be added to the listing of utilities participating in this program. At the time of the Enforcement Conference, OPPD was in the process of implementing the revised criteria from the WEPCO study.

AOO1
1/0

U.S. Nuclear Regulatory Commission
LIC-88-296
Page Two

OPPD believes that adherence to the WEPCO conduit sealing criteria is an effective method for determining which conduits must be sealed internally. If you have any questions, do not hesitate to contact us.

Sincerely,

R. L. Andrews for

R. L. Andrews
Division Manager
Nuclear Production

RLA/rh

c: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, DC 20036

R. D. Martin, NRC Regional Administrator, Region IV
A. Bournia, NRC Project Manager
P. H. Harrell, NRC Senior Resident Inspector