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VPNPD-94-087

NRC-94-063

September 9, 1994

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
CLARIFICATION OF REQUEST FOR EXEMPTION FROM
THE REQUIREMENTS OF 10 CFR 50, APPENDIX R, SECTION III
FOR THE AUXILIARY FEEDWATER PUMP ROOM
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On August 5, 1994, in accordance with the requirements of 10 CFR 50.12, Wisconsin Electric Power Company, the licensee for Point Beach Nuclear Plant, Units 1 and 2, submitted a request for exemption from the separation requirements of 10 CFR 50, Appendix R, Section III.G.2.b for the auxiliary feedwater pump room. We are submitting this letter to clarify information contained in the "Plant Instrumentation" and the "Cable Separation in Fire Area A23" sections of the original submittal.

In the August 5, 1994, submittal, we stated that conduit 1S079, associated with the Unit 1 yellow channel of safe shutdown instrumentation, does not meet the twenty-foot horizontal separation requirements of Section III.G.2.b of Appendix R. Conduit 1S079 is located within approximately four feet of the Unit 1 red channel, the closest redundant instrumentation channel. Unit 1 red channel instrumentation cables are located in cable tray FP04 as shown in Attachment 1. We also indicated our intention to modify this configuration by either rerouting conduit 1S079 to ensure that twenty-foot separation is achieved or by providing an equivalent means of separation.

We stated that the intended conduit modification is being performed in lieu of requesting exemption for the existing separation. The white instrument channel is the primary channel for monitoring plant conditions on Unit 1 in the event of a fire in the auxiliary feedwater pump room. The white channel conduit is wrapped with one-hour fire rated material in this fire area in accordance with Section III.G.2.c of Appendix R. Therefore, the Unit 1 red and yellow channels of instrumentation are not required to maintain conformance with Appendix R separation criteria.

A006
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However, in order to maximize the number of instrumentation channels available following a fire in the auxiliary feedwater pump room, it is prudent to perform the modification on conduit 1S079. Completion of this modification will ensure that either the Unit 1 red or yellow channel is available following a fire in the auxiliary feedwater pump room, providing added operational flexibility. The information concerning the modification was included in the August 5, 1994 submittal in order to ensure that the fire area's final configuration was described in the request for exemption.

Additionally, the configuration of conduit D01-2 is discussed in the original request for exemption. This conduit is approximately four feet in length and contains power cables for one channel of safe shutdown instrumentation. This conduit is separated by a horizontal distance of approximately sixteen feet from the other required instrumentation cables in cable tray FU01. This conduit is also located in the separation space between cable trays FR02 and FU01 as shown in Attachment 2.

Following our submittal of August 5, 1994 request for exemption, we determined that it was appropriate to wrap conduit D01-2 using fire barrier material with a one-hour fire rating to ensure that the conduit is protected from a fire in the fire area. This conduit will be wrapped with the E-50 series of fire barrier material manufactured by the 3M Corporation. The conduit wrap will be installed in accordance with the manufacturer's recommendations.

In addition to the clarifications to the "Plant Instrumentation" section, this letter is being submitted to modify information contained in the "Cable Separation in Fire Area A23" section of the request for exemption. In the August 5, 1994 submittal, we described four cable trays that were installed in the auxiliary feedwater pump room as part of the Diesel Generator Addition Project. Three of the four cable trays present an intervening combustible between redundant divisions of Appendix R safe shutdown components. The configuration of these cable trays is shown in Attachment 3. In order to minimize the impact of these three cable trays, we committed to perform modifications involving the installation of sheet metal tray covers, ceramic fiber blankets, and cable tray fire breaks. These modifications, however, were only being performed on the portions of the three cable trays situated between redundant divisions of Appendix R safe shutdown components located in cable trays FR02 and FU01.

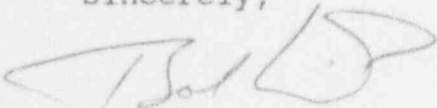
Following our submittal of the August 5, 1994 request for exemption, we decided that it was appropriate to revise the

modifications being performed on the three cable trays. We are now installing sheet metal tray covers on the top and bottom of cable tray GG01-GG04 along its entire length in the auxiliary feedwater pump room. Additionally, sheet metal tray covers will be installed on the top of cable trays GN01-GN03 and GW01-GW03 along their entire lengths in the auxiliary feedwater pump room, with tray covers also being installed on the bottom of these cable trays for the portions of their runs that are not shielded by the three-hour, fire-rated tunnel. A single layer of ceramic fiber blanket will be installed on the top of the cables in the three cable trays under the sheet metal covers, and cable tray fire breaks will be installed, as needed, to prevent a fire from entering the enclosed portion of the cable trays. We believe that this revision is an improvement on the previous cable tray modifications that will further minimize the impact of the three cable trays as an intervening combustible.

Finally, in the August 5, 1994 submittal, we stated, in error, that cable tray GC01-GC02 would have sheet metal tray covers installed on the top and bottom of the cable tray. Tray covers are not being installed on cable tray GC01-GC02 because it does not present an intervening combustible between redundant divisions of Appendix R safe shutdown components. Therefore, as stated in the above paragraph, we intend to install sheet metal tray covers on the top and bottom of cable tray GG01-GG04. Please note this correction during your review of the August 5, 1994, request for exemption.

Please contact us if there are any questions concerning this letter or the original request for exemption.

Sincerely,



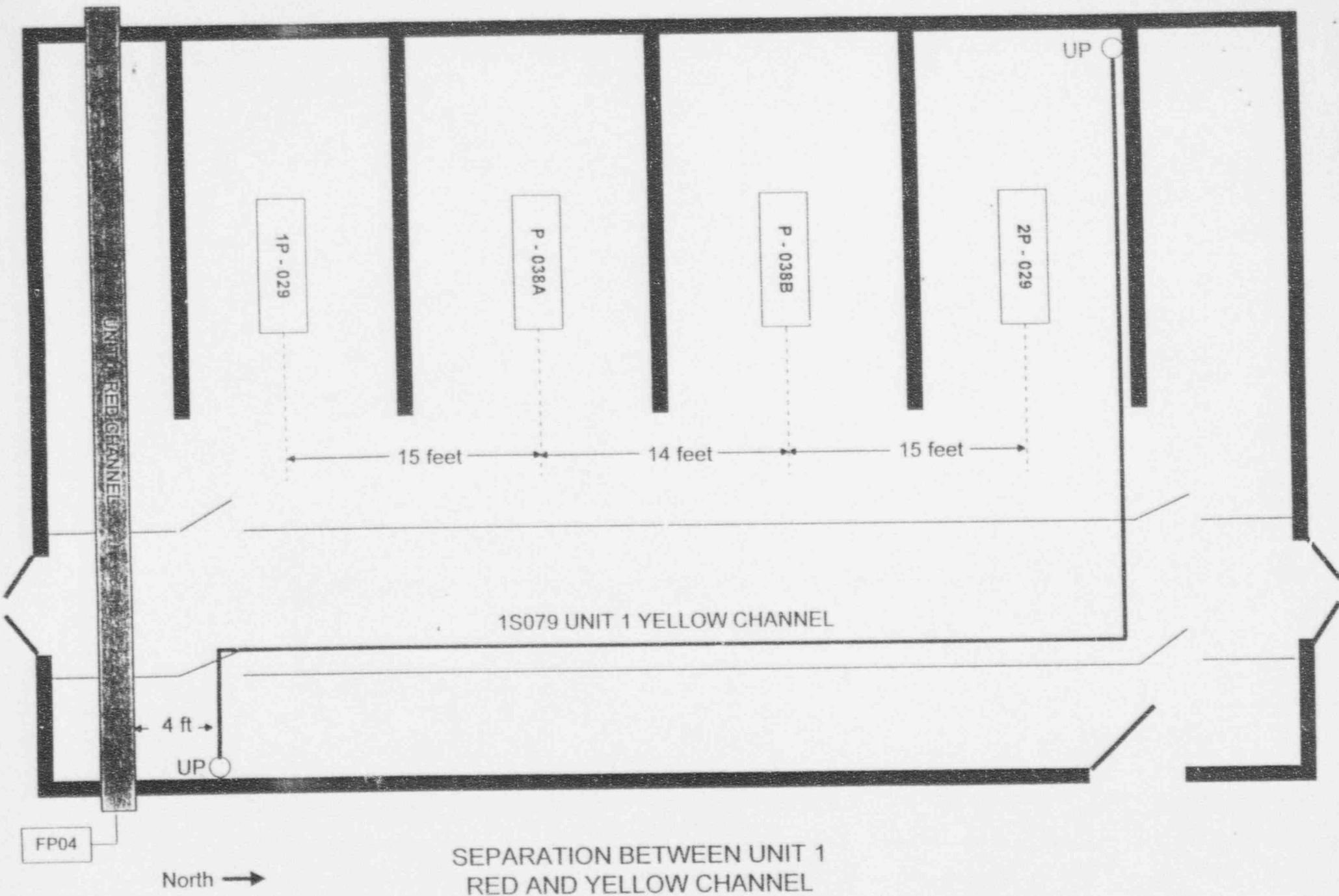
Bob Link
Vice President
Nuclear Power

Enclosures

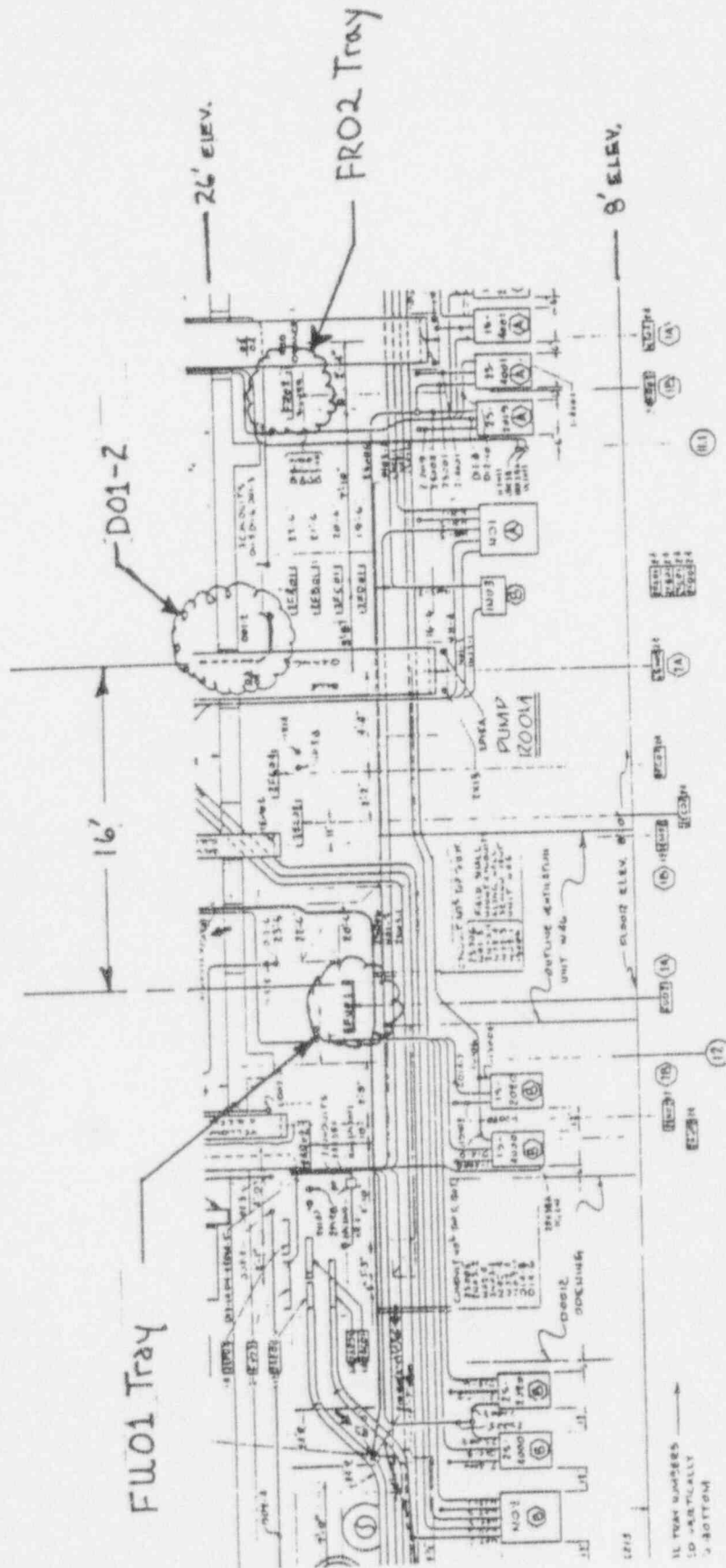
cc: NRC Resident Inspector
NRC Regional Administrator

FDP/jj

Attachment 1



ATTACHMENT 2



Auxiliary Feedwater Pump - Fire Area A23

Elevation 8'-0" Looking East

Section A-A

Attachment 3

