

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011-4005

November 18, 2004

Mr. M. R. Blevins, Senior Vice President and Chief Nuclear Officer TXU Energy ATTN: Regulatory Affairs Comanche Peak Steam Electric Station P.O. Box 1002 Glen Rose, Texas 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION - NOTIFICATION OF AN NRC TRIENNIAL FIRE PROTECTION BASELINE INSPECTION 05000445/2005008 AND 05000446/2005008

Dear Mr. Blevins:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC), Region IV staff will conduct a triennial fire protection baseline inspection at the Comanche Peak Steam Electric Station in January and February of 2005. The inspection team will be comprised of reactor inspectors from the NRC Region IV office. The inspection will be conducted in accordance with Inspection Procedure 71111.05, "Fire Protection," the NRC's baseline fire protection inspection procedure.

The schedule for the inspection is as follows:

- Information gathering visit: January 11 13, 2005
- Onsite inspection: January 24 28 and February 7 11, 2005

Members of the inspection team will visit the Comanche Peak Steam Electric Station on January 11 - 13, 2005, to gather information and documents needed to support the inspection, obtain unescorted access, and to become familiar with your fire protection program. The enclosure to this letter provides a list of the types of documents the team will want to review. After reviewing, the team leader will request that you transmit copies of some of the documents to the NRC Region IV office for team use in preparation for the inspection. We would appreciate it if you could send this information so that it will arrive in our office in Arlington, Texas, no later than noon on January 18, 2005.

We request that during the onsite inspection week, you ensure that copies of analyses, evaluations, or documentation regarding the implementation and maintenance of the fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest are those documents that establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC

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and industry fire protection guidance. Also, appropriate personnel knowledgeable of: (1) those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room, (2) the electrical aspects of the post-fire safe shutdown analyses, (3) reactor plant fire protection systems, and (4) the fire protection program and its implementation should be available to support the team at the site during the inspection.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection or the inspection team's information or logistical needs, please contact Ray Mullikin at (817) 860-8102 or Linda Smith at (817) 860-8137.

Sincerely,

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Linda J. Smith, Chief Plant Engineering Branch Division of Reactor Safety

Enclosure: Triennial Fire Protection Inspection Supporting Documentation

Dockets: 50-445 50-446 Licenses: NPF-87 NPF-89

cc w/enclosure: Fred W. Madden Regulatory Affairs Manager TXU Generation Company LP P.O. Box 1002 Glen Rose, Texas 76043

George L. Edgar, Esq. Morgan Lewis 1111 Pennsylvania Avenue, NW Washington, DC 20004

Terry Parks, Chief Inspector Texas Department of Licensing & Regulation Boiler Division P.O. Box 12157 Austin, Texas 78711

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The Honorable Walter Maynard Somervell County Judge P.O. Box 851 Glen Rose, Texas 76043

Richard A. Ratliff, Chief Bureau of Radiation Control Texas Department of Health 1100 West 49th Street Austin, Texas 78756-3189

Environmental and Natural Resources Policy Director Office of the Governor P.O. Box 12428 Austin, Texas 78711-3189

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ADAMS:	Yes	No	Initials:	_				
Publicly	Available	Non	-Publicly Available		Sensitive	No	on-Sensitive	

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RIV: DRS/PEB	C: PEB				
RPMullikin	LJSmith				
/RA/	RPMullikin for				
11/ 16 /2004	11/ 18 /2004				
OFFICIAL RECORD	T=Te	elephone	E=E-mail	F=Fax	

Triennial Fire Protection Inspection Supporting Documentation

- 1. The current version of your fire protection program and fire hazards analysis.
- 2. Post-fire safe shutdown analysis.
- 3. A listing of the fire protection program implementing procedures (e.g., administrative controls, maintenance, surveillance testing, fire brigade).
- 4. A listing of operating procedures used for achieving and maintaining hot and cold shutdown conditions from the control room in the event of a fire outside the control room.
- 5. A listing of operating procedures used to implement alternative shutdown capability with or without control room evacuation.
- 6. Pre-fire plans for the selected fire areas (to be determined by the team leader during the information-gathering trip).
- 7. Piping and instrumentation (flow) diagrams for systems used to achieve and maintain hot standby and cold shutdown in the event of a fire in selected fire areas and in alternative shutdown fire areas.
- Plant layout and equipment drawings for the selected fire areas that identify (a) the physical plant locations of major hot standby and cold shutdown equipment;
 (b) plant fire area and/or fire zone delineation; and ©) the locations of fire protection equipment, such as detection, suppression, and post-fire emergency lighting units.
- 9. Electrical schematics and cable raceway listings for circuits supplying power to components used to achieve and maintain hot standby and cold shutdown for fires outside the control room and those components used for those areas requiring alternative shutdown capability.
- 10. A listing of design change packages, involving fire protection and post-fire safe shutdown, performed in the last 3 years.
- 11. A listing of Generic Letter 86-10 evaluations performed in the last 3 years.
- 12. Listing of open and closed fire protection Notifications initiated in the last 3 years.
- 13. Copies of the licensing basis documents for fire protection (safety evaluation reports, pertinent sections of the Final Safety Analysis Report, exemptions, deviations, etc.).
- 14. A listing of applicable codes and standards related to the design of plant fire protection features and evaluations of any code deviations.

- 15. The plant's individual plant examination external event report (IPEEE), results of any post-IPEEE reviews, and listings of actions taken or plant modifications conducted in response to IPEEE information.
- 16. Organization charts of site personnel down to the level of fire protection staff personnel.