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Ref. # 10CFR50.48

December 13, 1993

William J. Cahill, Jr.  
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
TRANSMITTAL OF FIRE PROTECTION REPORT, REVISION 8

Gentlemen:

TU Electric, the owner of CPSES Units 1 and 2, herewith submits Revision 8 of the CPSES Fire Protection Report (FPR).

Enclosed are the following documents:

Fire Protection Report - 1 signed (and sworn)  
Revision 8 original and 10 copies

A page-by-page description of the changes is attached. The group number assigns a level of significance for each change made to the Fire Protection Report consistent with TU Electric's letter TXX-88467 of June 1, 1988. In addition, all changes have been reviewed under the TU Electric 50.59 process and found not to include any "unreviewed safety questions".

Pages which do not have technical changes but are included in the revision (because a change shifted the existing material to another page or because only editorial changes were made to the Fire Protection Report) are not discussed in the enclosure "CPSES FPR Revision 8 Detailed Description". These changes will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

FPR Revision 8 is being issued on December 13, 1993 and will be executed at 12:01 a.m. on December 21, 1993.

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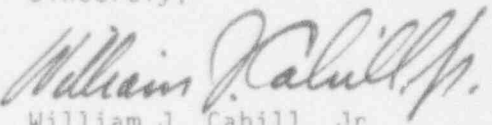
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If you should have any questions, please contact Mr. Jacob Kulangara at  
(214) 812-8818.

Sincerely,

  
William J. Cahill, Jr.

JMK/  
Attachments  
Enclosures

c - Mr. J. L. Milhoan, Region IV  
Resident Inspectors, CPSES (2)  
Mr. T. A. Bergman, NRR (3 Copies)

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
Texas Utilities Electric Company ) Docket Nos. 50-445 and 50-446  
 ) License Nos. NPF-87 and NPF-89  
(Comanche Peak Steam Electric )  
Station, Units 1 and 2) )

AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear Production of TU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this transmittal of the Fire Protection Report Revision 8; for the captioned facilities; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.



*William J. Cahill, Jr.*  
\_\_\_\_\_  
William J. Cahill, Jr.  
Group Vice President,  
Nuclear Production

STATE OF TEXAS )  
 )  
COUNTY OF DALLAS )

Subscribed and sworn to before me, on this 13th day of December, 1993.

*Wayne L. Peck*  
\_\_\_\_\_  
Notary Public

CPSES - FIRE PROTECTION REPORT ( FP )  
AMENDMENT / REVISION 8  
DETAILED DESCRIPTION

Prefix Page  
(as amended)

Group Description

II-138

- 3 Revises the following combustible loading data for Fire Area WA/Fire Zone WA103:  
Actual Fire Load - changed from 328,800 to 5300 BTU/sq. ft.  
Fire Duration - changed from 246 to 4 minutes.  
Type (of combustible) - deletes the 504 gallons of Diesel Fuel
- Revision :
- The Emergency Diesel Fire pump originally intended to provide lake water as a source of water for the Fire Protection system was abandoned in place as identified in the Fire Protection Report. To comply with Texas Water Commission requirements for underground storage tanks, the diesel fuel oil storage tank for this abandoned pump has been removed. Thus, the combustible loading data is being revised to reflect this change.
- Change Request Number : FP-93-4.1  
Commitment Register Number :  
Related SER : 9.5.1.1 SSER :26 9.5.1  
SER/SSER Impact : No

IV-3

- 3 In Section 2.0, Tests/Inspections, the following statement is deleted from the last paragraph on the page: "Furthermore, the combined time interval for any three consecutive test/inspections will not exceed 3.25 times the specified test/inspection interval." The following statement is added to that same paragraph on this page: "It is not intended that this provision be used repeatedly as a convenience to extend test/inspection intervals beyond that specified for tests/inspections that are not performed during refueling outages".
- Revision :
- The limit on consecutive extensions was left over from the time when it existed in the Standard Technical Specifications. The wording was carried over into the Fire Protection Report when the fire protection requirements were relocated from the Technical Specifications under Generic Letters 86-10 and 88-12. Generic Letter 89-14 recommends that affected licensees submit a Technical Specification change to delete the consecutive interval limit in Section 4.0.2 of the Specifications and to add a statement to the related Bases Section to note that it is not intended for the (existing) 25% extension allowance to be used repeatedly. Based on those justifications presented in Generic Letter 89-14, it

Prefix Page  
(as amended)

Group Description

is concluded that it is acceptable to also remove this same requirement from the Fire Protection Report, and to add a statement (to this section of the Report) that informs the user that the 25% extension allowance is not intended to be used repeatedly.

Change Request Number : FP-93-2.1  
Commitment Register Number :  
Related SER : SSER :12 9.5.1.2  
SER/SSER Impact : No

IV-6

3

In Section 2.1.b.3.a., the frequency of the surveillance check for confirming that the diesel fire pump battery voltage and electrolyte levels are acceptable, is changed from 7 to 92 days.

Revision :

Section IV-2.1.b.2.a.2 of the Fire Protection Report is revised to require for the diesel fire pumps (DFPs) to be started and operated for at least 30 minutes, every 14 days in lieu of the present interval of 31 days, as a partial justification for relaxing this battery surveillance.

Additionally, a malfunction of the battery or charger would be annunciated in the control room. A loss of AC power or charger malfunction would result in an automatic start of the diesel fire pump. The surveillance practices, combined with the existing design features, provide for a timely and meaningful indication of DFP battery operability status compared to the indication provided by the weekly check of battery electrolyte levels and voltage. Also, the surveillance to check overall battery voltage of each DFP battery is enhanced to require the chargers to be OFF for at least 15 minutes before performing the battery surveillance. This change places the surveillance in line with the frequency for the closely related requirement for confirming acceptability of battery specific gravity.

Change Request Number : FP-93-2.2  
Commitment Register Number :  
Related SER : SSER :12 9.5.1.2  
SER/SSER Impact : No

IV-6

3

In Section 2.1.b.2.a., the surveillance frequency is increased by reducing the interval from 31 days to 14 days, for verifying diesel fire pump fuel tank level and start and run for 30 minutes. In Section 2.1.b.2.a.1, the bracket for the fuel storage tank volume of 100 gallons is deleted.

Revision :

This increase in the surveillance testing for diesel fire pump is used as one of the justifications for

Prefix Page  
(as amended)

Group Description

relaxing the battery surveillance test frequency. The bracket for the fuel storage tank volume was intended to identify that the value was yet to be confirmed. This value was verified prior to Unit 1 license and was found accurate by Engineering and also independently by contractor; however the bracket was inadvertently left in place and is being deleted to correct this administrative error.

Change Request Number : FP-93-2.4  
Commitment Register Number :  
Related SER : SSER :12 9.5.1.2  
SER/SSER Impact : No

IV-7

3 For Section 2.1.b.3. (covering operability checks of the diesel fire pump battery banks and chargers); In part a.2., the requirement is added to have the battery chargers off for at least 15 minutes when checking the battery voltages; in part b., the word "barrier" is corrected to be "battery"; in part c.1., the words "cell plates" are deleted from the requirement involving visual inspection of the batteries.

Revision :  
Adding the requirement to have the battery chargers off for at least 15 minutes when performing the surveillance check of diesel fire pump battery voltages will yield results which are more indicative of actual battery conditions (unsupported by the battery chargers). Changing the word "barrier" to "battery" corrects a typographical error. The cell plates are deleted from the visual check of the batteries since the plates of these batteries are not visible. The cases of these batteries are of a black plastic construction, which is typical of this type of application.

Change Request Number : FP-93-2.3  
Commitment Register Number :  
Related SER : SSER :12 9.5.1.2  
SER/SSER Impact : No

Table IV-1

4 See Sheet No(s) :19  
Corrects number of smoke detectors for room 1-085D from 18 to 11 "X"-type (early warning) detectors.  
Correction :  
Corrects word processing error made when the Table was changed during Revision 6 of the Fire Protection Report.

Change Request Number : FP-93-3.1  
Commitment Register Number :  
Related SER : SSER :  
SER/SSER Impact : No

Table IV-1

4 See Sheet No(s) :20

Prefix Page (as amended)	Group Description
	<p>Corrects the room numbers shown as 1-084 and 1-080 to be 1-080 and 1-084 respectively.</p> <p>Correction :</p> <p>See justification given in Change Request Number FP-93-3.1.</p> <p>Change Request Number : FP-93-3.2</p> <p>Commitment Register Number :</p> <p>Related SER : 9.5.1.1 SSER :26 9.5.1</p> <p>SER/SSER Impact : No</p>
Table IV-1	<p>4 See Sheet No(s) :21</p> <p>Corrects the number of detectors shown for room 1-090 from 5 to 2 "X"-type (early warning) detectors.</p> <p>Correction :</p> <p>See justification given for Change Request Number FP-93-3.1.</p> <p>Change Request Number : FP-93-3.3</p> <p>Commitment Register Number :</p> <p>Related SER : 9.5.1.1 SSER :26 9.5.1</p> <p>SER/SSER Impact : No</p>
Table IV-1	<p>4 See Sheet No(s) :23</p> <p>Adds one "X"-type (early warning) detector to the list of those found in the Auxiliary Building. The change shows it is located in fire zone 21a, detection zone 21a, room X-163, designated as a zone 5 radiation area outside containment, at elevation 790'6".</p> <p>Correction :</p> <p>This change corrects discrepancies found between the number, description and location of fire detection equipment shown in the Table and the as-built configuration. This change was inadvertently excluded from previous Revisions to the Fire Protection Report and is not due to a plant modification.</p> <p>Change Request Number : FP-93-3.4</p> <p>Commitment Register Number :</p> <p>Related SER : 9.5.1.1 SSER :26 9.5.1</p> <p>SER/SSER Impact : No</p>
Table IV-1	<p>4 See Sheet No(s) :23</p> <p>Removes the designation of Zone V radiation area outside containment shown for Auxiliary Building room X-190 in the Table.</p> <p>Correction :</p> <p>See justification for Change Request Number FP-93-3.4.</p> <p>Change Request Number : FP-93-3.5</p> <p>Commitment Register Number :</p> <p>Related SER : 9.5.1.1 SSER :26 9.5.1</p> <p>SER/SSER Impact : No</p>

Prefix Page (as amended)		Group Description
Table IV-1	4	See Sheet No(s) :24 Corrects Auxiliary Building room number shown as X-210# to be X-210A#. Correction : See justification given for Change Request Number FP-93-3.1. Change Request Number : FP-93-3.6 Commitment Register Number : Related SER : 9.5.1.1 SSER :26 9.5.1 SER/SSER Impact : No
Table IV-1	4	See Sheet No(s) :28 Corrects the last line on the page for the Electrical & Control Building room number from X-150 to be X-136. Correction : See justification given for Change Request Number FP-93-3.1. Change Request Number : FP-93-3.7 Commitment Register Number : Related SER : 9.5.1.1 SSER :26 9.5.1 SER/SSER Impact : No
Table IV-1	4	See Sheet No(s) :29 1.) Corrects Electrical & Control Building room number X-148 at elevation 340'6" to be room X-146 at elevation 830'0". 2.) Corrects the number of detectors shown for room X-150 at elevation 854'4" from 13 to 14 "X"-type (early warning) detectors. Correction : See justification given for Change Request Number FP-93-3.4. Change Request Number : FP-93-3.8 Commitment Register Number : Related SER : 9.5.1.1 SSER :26 9.5.1 SER/SSER Impact : No
Table IV-1	4	See Sheet No(s) :30 1.) Corrects the number of detectors shown in Electrical & Control Building room X-150A from 13 to 14 "X"-type (early warning) detectors. 2.) Splits up the 10 "X"-type detectors shown for Fuel Building room X-255 to show that 7 of the detectors are located in fire zone 99a, detector zone 99a and the remaining 3 "X"-type detectors in the room are located fire zone 99a, detection zone 99b. Correction : See justification given for Change Request Number FP-93-3.4. Change Request Number : FP-93-3.9



Prefix Page (as amended)	Group Description
Table IV-1	<p>4</p> <p>Commitment Register Number : Related SER : 9.5.1.1 SSER :26 9.5.1 SER/SSER Impact : No</p> <p>See Sheet No(s) :31 1.) Corrects the Fuel Building room number shown as X-205A to be X-250A. 2.) Removes the zone 5 radiation area designation from Fuel Building room X-252. 3.) Corrects the fire zone number for detectors in room X-262 from 99c to be 99a. Correction : 1.) - See justification given for Change Request Number FP-93-3.1. 2.) and 3.) - See justification given for Change Request Number FP-93-3.4. Change Request Number : FP-93-3.10 Commitment Register Number : Related SER : 9.5.1.1 SSER :26 9.5.1 SER/SSER Impact : No</p>
Table IV-1	<p>4</p> <p>See Sheet No(s) :38 Corrects the symbol given to designate Zone V radiation area outside containment from "=" to "#". Correction : See justification given for Change Request Number FP-93-3.1. Change Request Number : FP-93-3.11 Commitment Register Number : Related SER : 9.5.1.1 SSER :26 9.5.1 SER/SSER Impact : No</p>

ENCLOSURES

COMANCHE PEAK STEAM ELECTRIC STATION  
FIRE PROTECTION REPORT  
INSTRUCTION SHEET

The following instructional information is being furnished to help insert Revision 8 into the Comanche Peak Steam Electric Station Fire Protection Report.

Discard the old sheets and insert the new sheets as indicated below.

Holdings of the CPSES Fire Protection Report should keep these instruction sheets in the front of the Effective Page Listing as a record of the changes, until a new listing is issued.

<u>Remove</u>	<u>Insert</u>
Title Page	Title Page
II-138	II-138
IV-3	IV-3
IV-6	IV-6
IV-7	IV-7
IV-19 thru IV-21	IV-19 thru IV-21
IV-23 thru IV-31	IV-23 thru IV-31
IV-38	IV-38
EPL-4	EPL-4
EPL-7	EPL-7