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 Ref. # 10CFR50.48

William J. Cahill, Jr.
 Executive Vice President

February 15, 1991

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
 DOCKET NO. 50-445
 TRANSMITTAL OF FIRE PROTECTION REPORT, REVISION 4

Gentlemen:

TU Electric, the principal operator and acting as agent for Texas Municipal Power Agency, herewith submits Revision 4 of the CPSES Fire Protection Report.

Enclosed are the following documents:

Fire Protection Report - 1 signed (and sworn)
 Revision 4 original and 37 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 attachment. Furthermore, an "Effective Page Listing" is provided for use in maintaining the Fire Protection Report Current. These changes will not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

Sincerely,

William J. Cahill, Jr.
 William J. Cahill, Jr.

9102200153 910215
 PDR ADOCK 05000445
 F PDR

JDS/gj
 Attachment

200024 R. D. Martin, Region IV
 Resident Inspectors, CPSES (3)

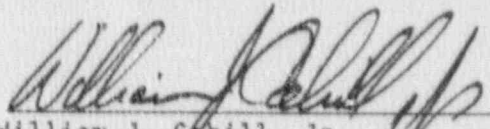
Mr. J. N. Clifford, NRR
 400 North Olive Street L.B. 81 Dallas, Texas 75201

*A006
 1/38*

In the Matter of)
)
Texas Utilities Electric Company) Docket No. 50-445
)
(Comanche Peak Steam Electric)
Station, Unit 1))

AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Executive Vice President, Nuclear of TU Electric, the lead Applicant hereto; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this transmittal of the Fire Protection Report Revision 4; 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.



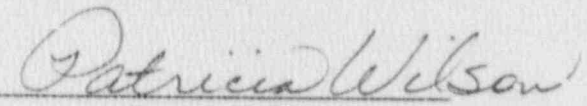
William J. Cahill, Jr.
Executive Vice President, Nuclear

STATE OF TEXAS)
)

Notary Seal

COUNTY OF Somervell

Subscribed and sworn to before me, a Notary Public, Patricia Wilson, on this
14th day of February, 1991.



Notary Public



<u>FPR Page</u> <u>(as amended)</u>	<u>Group</u>	<u>Description</u>
I-5	4	Clarification: Change the definition of actual fire load to round off to the nearest 100 BTU/sq. ft. FPR Change Request Number: FP-90-002B Related SSER Section: SSER22 9.5 SER/SSER Impact: No
I-2, 3, 8	4	See Page No(s):II-14, 120, 148, 155, 160, 165, VB-3 Editorial: Editorial corrections. FPR Change Request Number: FP-90-002A Related SSER Section: SSER22 9.5 SER/SSER Impact: No
I-9, 1., II-10	4	Page 1 of the following deviations: 1a, 3a, 3a-1, 3b, 3c, 3c-1, 3d, 3e, 3g, 4a, 4a-1, 8c, 10 Clarification: Changed reference to FHA drawings. Drawings M1-1920 through M1-1953 have superceded the formerly labeled FHA drawings. Drawing references have been updated to reflect reference to FPR figures or M1 drawings as appropriate. FPR Change Request Number: FP-90-002D Related SSER Section: SSER22 9.5 SER/SSER Impact: No
II-10	4	Update: DBD-ME-001 has been revised and is now titled "Fire Protection Program" instead of "Fire Hazard Analysis". In addition the document no longer contains FHA drawings. FPR Change Request Number: FP-90-101A Related SSER Section: SSER21 9.5 SER/SSER Impact: No
II-14, 125	3	See Page No(s):II-126, 130, 139, 146, FPR-13, 17,18 Update: Fire Zones TB 201 and TB 201A, battery rooms for Control Room Emergency Lighting, were added as separate fire zones. The Fire Protection Pump House was added as an external fire area. The Fire Protection Pump House was added in Rev. 2 of the FPR, however, these corrections were overlooked. Added fire zone (131) to yard area on FPR-17. FPR Change Request Number: FP-90-002E Related SSER Section: SSER22 9.5

FPR Page
(as amended)

Group Description

SER/SSER Impact: No

II-15

- 4 Clarification:
Changing "Combustible Loading" to "Actual Fire Loads" is included for consistency since the FHA portion of the FPR provides "Actual Fire Loads". Additionally, the acronym MPFL is clarified.
FPR Change Request Number: FP-90-001B
Related SSER Section: SSER21 9.5
SER/SSER Impact: No

II-16

- 2 Make provisions for Actual Fire Load values in plant areas to be tracked by the Operations Fire Protection Program until the periodic update of the FPR.
Revision:
The Actual Fire Load values as currently stated in the Fire Hazards Analysis portion of the FPR for each fire area/fire zone reflect base line values at the time the FPR was issued. This change allows provisions for changing these values since administrative/procedural controls maintain Actual Fire Load values below MPFL values and implement appropriate compensatory actions to assure fire safe shutdown capability is not adversely affected. In addition, changes in Actual Fire Load values will be incorporated into the FPR to support the annual update required by 10CFR50.71(e). This change will eliminate the requirement to process separate LDCRs for each change in type, quantity or location of in-situ combustibles incurred during plant operations.
Therefore, this change does not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
FPR Change Request Number: FP-90-001C
Related SSER Section: SSER21 9.5
SER/SSER Impact: No

II-133

- 2 See Page No(s): III-62, 63, Dev 1a pages 1,2 and 5
Remove Service Water Recirculation valves from the Fire Safe Shutdown Analysis.
Revision:
These valves are removed from the Fire Safe Shutdown Analysis. These valves were required operable for proper Station Service Water pump operation during fire safe shutdown. However, control circuitry changes for all Station Service Water pump valves have been made to provide a similar function to allow proper operation. Thus, this design change does not adversely affect the

FPR Page
(as amended)

Group Description

- ability to achieve and maintain safe shutdown in the event of a fire.
FPR Change Request Number: FP-89-017
SER/SSER Impact: No
- 11-18-20, 23,24 3 See Page No(s):26-28,32,34,36,37,40,45,51,52,54,56, Additional sheet numbers: 58,62-66,68,69,71,72-75,88, 90,91,93,96,98,100,102-106,112,116-122,124,125,127-129, 130,132,135,138,143, page 1 of dev. 1b, Tables 3a, 3b, 3c, 3d, 3e, 3g, page 2 of dev. 3a-1, page 5 of dev. 3h, page 2 of dev. 4a-1.
Update:
Provide changes in Actual Fire Load Values and associated Fire Duration values to reflect updated values.
FPR Change Request Number: FP-90-002C
Related SSER Section: SSER22 9.5
SER/SSER Impact: No
- IV-25 3 See Page No(s):Figure FPR-18
Update:
Reflect the addition of AA188 for room number 250A of the fuel building per recommendations of American Nuclear Insurers. Additionally, figure FPR-18 has been revised to be consistent with other FPR figures and also to add the fire area/zone designation to room number 49A. These changes do not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.
FPR Change Request Number: FP-89-016A
SER/SSER Impact: No
- IV-32 3 Update:
Hose stations were added to provide additional coverage for the Safeguards building.
FPR Change Request Number: FP-90-002F
Related SSER Section: SSER22 9.5
SER/SSER Impact: No
- dev 4a-1 2 See Page No(s):PAGE 2 of 6
Modify deviation to include installation of "soft run" instrumentation cable for the Data Acquisition System.
Revision:
The installation of "soft run" instrumentation cable in the containment does not adversely affect the Fire Protection Program due to the following considerations:
1. The additional cabling is being used for the acquis-

FPR Page
(as amended)

Group Description

ition of instrumentation signals for the Data Acquisition System computer from different input points in the field. The majority of the inputs to the computer are acquired from panels in the control room/cable spreading room complex. Only signals not available in the control room are obtained in the field. The cable from the data points in the field will be isolated runs and will not represent a significant fire propagation path.

2. The cable is not being run in significant concentrations. The quantity of cable being run is not significant compared to the amount of scheduled cable in the area.
3. The cable being run is qualified to meet the IEEE 383 flame spread test requirements and is limited to low power applications (instrumentation).

FPR Change Request Number: FP-89-015

SER/SSEP Impact: No

dev 5a--

- 2 See Page No(s):PAGE 1 OF 1

Revision:

Incorporates the computerized Data Acquisition System (DAS) to acquire and monitor selected plant process variables required to support plant startup and operation. In addition to startup, the DAS will support the following:

- Surveillance Testing
- Provide simulator validation
- Provide benchmark data for accident analysis models
- Provide additional plant monitor/event logging
- Provide thermal stratification data

The three interface cables linking the computer memory cabinets located in the Cable Spreading Room to the computer peripherals located in the Control Room are furnished by Hewlett Packard (the computer vendor). The computer link cables are manufactured in accordance with the vendor specifications for low radio frequency interference, interface bus and cable assembly, and meets or exceeds the applicable sections of IEEE-408, 1978. Each cable is constructed of 26 conductors (two of which are not insulated for shielding purposes) 26 gauge wire insulated with .014 inches of polyvinylchloride (PVC) and jacketed by .035 inches of PVC. The total footage of these cables in the Cable Spreading Room is approximately 165 feet and approximately 30 feet is installed in the Control Room. These cables carry low energy level signals and a cable fire due to internal cable faults isn't credible. The cables only pose a potential hazard due to an exposure fire. However, conservative estimates of

FPR Page
(as amended)

Group Description

toxic chemical concentrations due to the combustion of the PVC cables within the Control Room envelope determine that the combustion of these PVC cables does not impact Control Room habitability. The ability to achieve and maintain safe shutdown in the event of a fire is not impacted by this change.
FPR Change Request Number: FP-89-015A
SER/SSER Impact: Yes

COMANCHE PEAK STEAM ELECTRIC STATION
FIRE PROTECTION REPORT
INSTRUCTION SHEET

The following instructional information is being furnished to help insert Revision 4 into the Comanche Peak Steam Electric Station Fire Protection Report.

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

HOLDERS 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
Report Index	Report Index
I-2	I-2
I-3	I-3
I-5	I-5
I-8	I-8
I-9	I-9
I-11	I-11
II-4	II-4
II-10	II-10
II-15	II-15
II-16	II-16
II-18 thru II-20	II-18 thru II-20
II-23	II-23
II-24	II-24
II-26 thru II-28	II-26 thru II-28
II-32	II-32
II-34	II-34
II-35	II-35
II-37	II-37
II-40	II-40
II-45	II-45
II-51	II-51
II-52	II-52
II-54	II-54
II-56	II-56
II-58	II-58
II-62 thru II-69	II-62 thru II-69
II-71	II-71
II-82 thru II-86	II-82 thru II-86
II-88	II-88
II-90	II-90
II-91	II-91
II-93	II-93

Remove

II-96
II-98
II-100
II-102 thru II-106
II-112
II-114
II-116 thru II-122
II-124 thru II-130
II-132
II-133
II-135
II-138
II-139
II-143
II-146
II-148
II-155
II-160
II-165

III-62

IV-25
IV-32

VB-3

Deviation 1a-Pg. 1
Deviation 1a-Pg. 2

Deviation 1b-Pg. 1

Deviation 3a-Pg. 1
Deviation 3a-Table

Deviation 3a1-Pg. 1
Deviation 3a1-Pg. 2
Deviation 3a1-Table

Deviation 3b-Pg. 1
Deviation 3b-Table

Deviation 3c-Pg. 1
Deviation 3c-Table

Deviation 3c1-Pg. 1

Deviation 3d-Pg. 1
Deviation 3d-Table

Deviation 3e-Pg. 1
Deviation 3e-Table

Insert

I-96
II-98
II-100
II-102 thru II-106
II-112
II-114
II-116 thru II-122
II-124 thru II-130
II-132
II-133
II-135
II-138
II-139
II-143
II-146
II-148
II-155
II-160
II-165

III-62

IV-25
IV-32

VB-3

Deviation 1a-Pg. 1
Deviation 1a-Pg. 2

Deviation 1b-Pg. 1

Deviation 3a-Pg. 1
Deviation 3a-Table

Deviation 3a1-Pg. 1
Deviation 3a1-Pg. 2
Deviation 3a1-Table

Deviation 3b-Pg. 1
Deviation 3b-Table

Deviation 3c-Pg. 1
Deviation 3c-Table

Deviation 3c1-Pg. 1

Deviation 3d-Pg. 1
Deviation 3d-Table

Deviation 3e-Pg. 1
Deviation 3e-Table

Remove

Deviation 3g-Pg. 1
Deviation 3g-Table (Pg. 1)

Deviation 3h-Pg. 1
Deviation 3h-Pg. 5

Deviation 4a-Pg. 1

Deviation 4a1-Pg. 1
Deviation 4a1-Pg. 2

Deviation 5a-Pg. 1

Deviation 8c-Pg. 1

Deviation 10-Pg. 1

Figure FPR-13
Figure FPR-17
Figure FPR-18

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Insert

Deviation 3g-Pg. 1
Deviation 3g-Table (Pg. 1)

Deviation 3h-Pg. 1
Deviation 3h-Pg. 5

Deviation 4a-Pg. 1

Deviation 4a1-Pg. 1
Deviation 4a1-Pg. 2

Deviation 5a-Pg. 1

Deviation 8c-Pg. 1

Deviation 10-Pg. 1

Figure FPR-13
Figure FPR-17
Figure FPR-18

EPL-1 thru EPL-8