



Log # TXX-92327
File # 10010 cto
848
Ref. # 10CFR50.48

July 31, 1992

William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PL. K STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
TRANSMITTAL OF FIRE PROTECTION REPORT, REVISION 6

Gentlemen:

TU Electric, the owner of CPSES Units 1 and 2, herewith submits Revision 6 of the CPSES Fire Protection Report.

Enclosed are the following documents:

Fire Protection Report - 1 signed (and sworn)
Revision 6 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 6 Detailed Description". 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.

JMK/ds
Attachments
Enclosures

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

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PDR ADDOCK 05000445
F PDR

400 N. Olive Street L.B. 81 Dallas, Texas 75201


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1/10

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

AFFIDAVIT

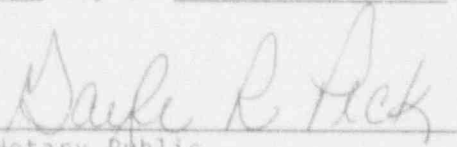
William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this transmittal of the Fire Protection Report Revision 6; for the captioned 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.
Group Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF DALLAS)

Subscribed and sworn to before me, on this 30th day of July, 1992.



Notary Public



Log # TXX-92327
File # 10010 clo
848
Ref. # 10CFR50.48

July 31, 1992

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 6

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Resident Inspectors, CPSES (2)
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Mr. B. E. Holian, NRR (3 Copies)

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F PDR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

AFFIDAVIT

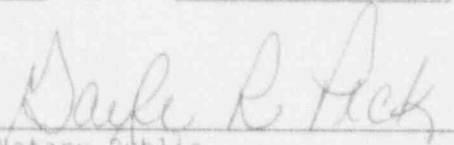
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William J. Cahill, Jr.
Group Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF DALLAS)

Subscribed and sworn to before me, on this 30th day of July, 1992.



Notary Public

CPLES FPR REVISION 6
DETAILED DESCRIPTION

FPR Page
(as amended)

Group Description

- I-1, 3 2 See Page No(s):06 and 11
Adds dual unit operation in the Fire Protection Report.
Addition:
 These changes add Unit 2 Fire Hazards Analysis and
 associated data.
FPR Change Request Number: FP-92-2.13
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No
- I-4, 6 4 See Page No(s):08, 09, 11, 16 and 17
Corrects typographical errors and makes minor editorial
changes.
Editorial:
 These changes are of editorial nature.
FPR Change Request Number: FP-92-2.0
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No
- I-10, 13 4 Adds information for clarity.
Clarification:
 These changes are of editorial nature.
FPR Change Request Number: FP-92-2.5
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No
- II-1, 4 2 See Page No(s):06,07,10,11,16,18,61,62,64,65,71,73,
Additional sheets: 74,75,77,79,81,82,88,90,91,93,94,96,
98,100-103,108,110,112,113,115,116,117,132,133,137,139,
140,145,146,192,206,208,211-216
Adds dual Unit operation in the Fire Protection Report.
Addition:
 These changes add Unit 2 Fire Hazards Analysis and
 associated data.
FPR Change Request Number: FP-92-2.14
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No
- II-2, 4 4 See Page No(s):08,09,12,17,18,19,23,30,32,35,37,38,
Additional sheet numbers:40,41,42,45,46,48,50,51,54,56,
61,71,73,74,75,79,82,90,91,93,94,96,98,100,101,102,
108,110,112,113,116,117,133,137,138,140,142,143,145,
146,200,211,212,214,215,216
Adds information for clarity.

CPSES FPR REVISION 6
DETAILED DESCRIPTION

FPR Page
(as amended)

Group Description

Clarification:

These changes are of editorial nature.
FPR Change Request Number: FP-92-2.6
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

II-3, 5

- 4 See Page No(s):09,16,17,18,37,55,88,93,115,133,137,
Additional sheets: II-139,142,145,147,192,195 and 213
Corrects typographical errors or makes minor editorial
changes.

Editorial:

These changes are of editorial nature.
FPR Change Request Number: FP-92-2.1
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

II-4, 5

- 2 See Page No(s):150 thru 191 and 195
Adds Unit 2 Fire Areas and associated information.
Addition:

These changes are to add Unit 2 Fire Hazards Analyses
and associated data.
FPR Change Request Number: FP-92-2.11
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

II-60, 99

- 2 See Page No(s):113,115,117,119,122,126,127-131,146,
Additional sheet: II-149
Adds Unit 2 specific information to a common Fire area.
Addition:

These changes are to add Unit 2 Fire Hazards Analyse,
and associated data.
FPR Change Request Number: FP-92-2.12
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

II-103, 104

- 3 See Page No(s):105, 106 and 107
Updates actual fire load and fire duration for fire
area E0 and within it's fire zones and changes the
description / types of combustibles within these fire
zones and corrects the square footage of fire area E0.
Update:

Calc. 0210-063-0006 Rev. 4 had incorrect square footage
for fire area E0 and the calculation was revised to
reflect occupancy changes in the plant. The new actu
fire loadings are under the max. permissible for zone.
FPR Change Request Number: FP-92-3.0
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

CPSES FPR REVISION 6
DETAILED DESCRIPTION

FPR Page
(as amended)

Group Description

II-198, 199

- 2 Revise items 2 and 3 of section II-6.2.6 to provide the basis for Unit 2 internal conduit fire seals by taking credit for automatic or manually actuated suppression system coverage on both sides of the fire barrier in addition to detection system coverage.

Addition:

Manually actuated fire suppression systems are installed in both the Units 1 and electrical switchgear rooms (83.96.103). These are the only plant areas where the primary fixed fire suppression systems required for separation of redundant safe shutdown cables and components are manually actuated. In the Unit 1 switchgear rooms, the suppression systems do not provide area-wide coverage and hence are not credited for enabling conduits penetrating fire barriers associated with these rooms to be sealed on one side (only) of the barrier. However, in Unit 2, the suppression systems are designed and installed to provide area-wide coverage. Therefore, in conjunction with the fire detection system coverage, which provides early warning alarm annunciation of a fire in its incipient stage for appropriate fire brigade response, the manually actuated suppression systems installed in the Unit 2 switchgear rooms provide a level of protection commensurate with automatically actuated systems. Based on the equivalent level of protection afforded by the manually actuated systems in Unit 2, conduits penetrating fire barriers associated with the Unit 2 switchgear rooms can be sealed on one side (only) of the barrier with no adverse affect on fire safe shutdown capability. Additionally, this approach to installing internal conduit fire seals represents cost savings associated with design, installation and long-term surveillance for approximately 300 fire seals.

FPR Change Request Number: FP-91 2.0

SER/SSER Impact: No

II-198, 199

- 3 Revise items 2 and 3 of section II-6.2.6 by referring to Appendix B of the FPR plus FCAR section 9.5.1.6.2. to provide for future FHA evaluations associated with internal conduit fire seals.

Correction:

This change maintains consistency in the FPR text by providing reference to Appendix B for instances where FHA evaluations are used to demonstrate compliance with with BTP APCSB 9.5-1, Appendix A.

FPR Change Request Number: FP-91-2.1

SER/SSER Impact: No

CPSES FPR REVISION 6
DETAILED DESCRIPTION

FPR Page (as amended)	Group	Description
II-198	3	<p>Adds option for providing gas and smoke seals installed at the first opening on both sides of the barrier for sealing conduits less than or equal to four inches nominal size in item 2 of section II-6.2.6.</p> <p>Addition: This change maintains consistency between the FSAR and FPR for criteria associated with internal conduit fire seals.</p> <p>FPR Change Request Number: FP-91-2.2 SER/SSER Impact: No</p>
II-198	4	<p>Revises paragraph 2 of section II-6.2.6 to reference Appendix C of the FPR since it contains the deviation evaluations.</p> <p>Editorial: This change corrects a typographical error.</p> <p>FPR Change Request Number: FP-91-2.3 SER/SSER Impact: No</p>
III-1, 15	2	<p>See Page No(s):17 and 31 Incorporates Unit 2 program in the Fire Protection Report.</p> <p>Addition: These changes are to show Unit 2 applicability based on Unit 2 fire protection calculation.</p> <p>FPR Change Request Number: FP-92-1.3 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No</p>
III-2, 5	2	<p>See Page No(s):06, 16, 26, 27, 28, 63 and 64 Incorporates Unit 2 program in the Fire protection Report.</p> <p>Addition: These changes are to address dual-unit operation and/or to include simultaneous shutdown per Unit 2 Fire Saf. Shutdown Analysis calculation.</p> <p>FPR Change Request Number: FP-92-1.5 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No</p>
III-2, 5	4	<p>See Page No(s):07,08,09,10,12,14-16,21,25,56,58,82 Corrects typographical errors or makes minor editorial changes.</p> <p>Editorial: These changes are of editorial nature.</p> <p>FPR Change Request Number: FP-92-1.0 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No</p>

CPSES FPR REVISION 6
DETAILED DESCRIPTION

<u>FPR Page</u> <u>(as amended)</u>	<u>Group</u>	<u>Description</u>
III-28	4	Adds information for clarity. Clarification: These changes are of editorial nature. FPR Change Request Number: FP-92-1.1 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No
III-36, 54	2	See Page No(s):58, 62, 64, 65, 66, 67, 80 and 81 Incorporates Unit 2 program in the Fire Protection Report. Addition: These changes are to add Unit 2 equipment based on Unit 2 Fire Safe Shutdown Equipment List. FPR Change Request Number: FP-92-1.4 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No
III-82	3	Adds revised reference list. Update: These changes are to incorporate the revised reference list. FPR Change Request Number: FP-92-1.2 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No
IV-1, 8	2	See Page No(s):10, 13, 14, 15, 17, 18 thru 48 Adds dual Unit operation in the Fire Protection Report. Addition: These changes add Unit 2 Fire Hazards Analysis and associated data. FPR Change Request Number: FP-92-2.15 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No
IV-3, 8	4	See Page No(s):10, 13, 14 and 17 Corrects typographical errors or makes minor editorial changes. Editorial: These changes are of editorial nature. FPR Change Request Number: FP-92-2.2 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No
IV-6, 7	4	See Page No(s):11, 12, 18 thru 48

CPSES FPR REVISION 6
DETAILED DESCRIPTION

FPR Page
(as amended)

Group Description

- Adds information for clarity.
Clarification:
These changes are of editorial nature.
FPR Change Request Number: FP-92-2.7
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No
- IV-17 2 Adds Unit 2 Fire Areas and associated information.
Addition:
These changes are to add Unit 2 Fire Hazards Analyses and associated data.
FPR Change Request Number: FP-92-2.11
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No
- V-1, 6 2 See Page No(s):G/
Adds dual Unit operation in the Fire Protection Report.
Addition:
These changes add Unit 2 Fire Hazards Analysis and associated data.
FPR Change Request Number: FP-92-2.16
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No
- V-2, 6 4 Corrects typographical errors or makes minor editorial changes.
Editorial:
These changes are of editorial nature.
FPR Change Request Number: FP-92-2.3
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No
- V-3 2 Adds Unit 2 specific information to a common Fire area.
Addition:
These changes are to add Unit 2 Fire Hazards Analyses and associated data.
FPR Change Request Number: FP-92-2.12
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No
- V-3 2 Adds Unit 2 specific information to a common Fire area.
Addition:
These changes are to add Unit 2 Fire Hazards Analyses and associated data.
FPR Change Request Number: FP-92-2.20
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

CPSES FPR REVISION 6
DETAILED DESCRIPTION

FPR Page (as amended)	Group	<u>Description</u>
V-3, 5	4	<p>See Page No(s):06 Adds information for clarity. Clarification: These changes are of editorial nature. FPR Change Request Number: FP-92-2.8 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No</p>
V-4	2	<p>Adds Unit 2 Fire Areas and associated information. Addition: These changes are to add Unit 2 Fire Hazards Analyses and associated data. FPR Change Request Number: FP-92-2.11 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No</p>
V-4	2	<p>Adds Unit 2 Fire Areas and associated information. Addition: These changes are to add Unit 2 Fire Hazards Analyses and associated data. FPR Change Request Number: FP-92-2.21 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No</p>
VB-2, 3	4	<p>Adds information for clarity. Clarification: These changes are of editorial nature. FPR Change Request Number: FP-92-2.9 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No</p>
VB-2, 3	2	<p>See Page No(s):06, 07 and 08 Changes Appendix B of FPR to incorporate provisions for utilizing the criteria and justification of the "Conduit Fire Protection Research Program" as the basis for internal conduit seal evaluations. Also makes minor editorial corrections to the "FHA Evaluation Matrix". Addition: Since the "Conduit Fire Protection Research Program" used actual fire testing to substantiate its conclusions, incorporation of these results into the CPSES design basis for internal conduit fire seals meets the the guidelines established by Appendix A to 57P APCSB 9.5-1 and Generic Letter 86-10. Additionally, the issues identified by NRC Information Notice 88-04 regarding substantiation of penetration seal configuration by test are likewise satisfied by the Wisconsin Electric study. Furthermore, the NRC's Safety Evaluation Report issued on October 23, 1989 in response to Wisconsin</p>

CPSES FPR REVISION 6
DETAILED DESCRIPTION

FPR Page
(as amended)

Group Description

Electric's submittal of the "Conduit Fire Protection Research Program" provided concurrence with the conclusions of the study. Therefore, sufficient regulatory acceptance of the study exists to justify it's incorporation into the CPSES design basis. Lastly, reduction of required conduit fire seals offers long term cost savings in that actions necessary for surveillance are in turn eliminated (ie. removal of junction box covers, conduit fittings, etc.).

FPR Change Request Number: FP-91-2.4
SER/SSER Impact: No

VB-4, 5

2 Adds dual Unit operation in the Fire Protection Report.
Addition:

These changes add Unit 2 Fire Hazards Analysis and associated data.

FPR Change Request Number: FP-92-2.16
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

V App. C-1

2 See Page No(s):1a shts 1-4, 1b(2) shts 1-3,
Additional sheets: 3a(2) shts 1-3, 3a-1(2) shts 1-4,
3b(2) shts 1-3, 3d(2) shts 1-5, 3e(2) shts 1-4, 3g(2)
shts 1-5, 3ha(2) shts 1-2,3hb(2) shts 1-2, 4a(2) sht 1,
4a-1(2) shts 1-6, 8b sht 1, 8c(2) shts 1-4, 10 sht 1
Adds dual unit operation in the Fire Protection Report.

Addition:

These changes add Unit 2 Fire Hazards Analysis and associated data.

FPR Change Request Number: FP-92-2.17
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

Table V App. C-3d

4 Corrects typographical errors or makes minor editorial changes.

Editorial:

These changes are of editorial nature.

FPR Change Request Number: FP-92-2.4
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

V App. C-3h

4 See Page No(s):01-03,8b Shts 1&2,10 Sht 1,14 Sht 1
Adds information for clarity.

Clarification:

These changes are of editorial nature.

FPR Change Request Number: FP-92-2.10
Related SER Section: 9.5.1; SSER21 9.5.1
SER/SSER Impact: No

CPSES FPR REVISION 6
DETAILED DESCRIPTION

FPR Page (as amended)	Group	Description
V App. C-8b	4	See Page No(s):01, 10 sht 1 Corrects typographical errors or makes minor editorial changes. Editorial: These changes are of editorial nature FPR Change Request Number: FP-92-2.19 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No
Figure FPR-25	2	See Sheet No(s):01 & 02, FPR-26 shts 1 & 2, Additional Figures: FPR-27 shts 1 & 2, FPR-28, FPR- 29 shts 1 & 2, FPR-30 shts 1 & 2, FPR-31, FPR-32, FPR-33, FPR-34 shts 1 & 2, FPR-35 Adds Unit 2 FHA figures in Section V Appendix D of the Fire Protection Report. Addition: These changes add Unit 2 Fire Hazards Analysis and associated data. FPR Change Request Number: FP-92-2.18 Related SER Section: 9.5.1; SSER21 9.5.1 SER/SSER Impact: No