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TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

August 6, 1985

WILLIAM G. COUNCIL
EXECUTIVE VICE PRESIDENT

Director of Nuclear Reactor Regulation
Attention: Mr. Vincent S. Noonan, Director
Comanche Peak Project
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
DOCKET NOS. 50-445 AND 50-446
OPERATOR ACTION FOR CONTROL ROOM/
CABLE SPREADING ROOM FIRE

Dear Mr. Noonan:

In accordance with recent discussions between our staffs, this letter provides clarification to Texas Utilities letter TXX-4478 dated May 21, 1985 as follows:

1. Attached is an amended response to NRC Question 010.32. This response will be included in a future amendment to the FSAR.
2. The referenced letter provided marked up copies of the CPSES Fire Protection Program Review (FPPR) delineating specific operator actions (and times for each action) required for safe shutdown during a Control Room/Cable Spreading Room fire. The NRC staff requested that we verify that the plant can be safely shutdown without operator action outside the Control Room for ten minutes.

We have reviewed the time requirements for operator actions outside of the Control Room. Actions required to preclude the possibility of spurious activations are initiated as rapidly as possible. Any other actions can be delayed for ten minutes without adversely affecting safe shutdown with the exception of the activities required to restore UPS room ventilation. For a Control Room/Cable Spreading Room fire concurrent with a loss of offsite power, operator actions to restore ventilation are currently required in less than ten minutes.

Should you have any questions in this matter, please contact this office.

Very truly yours,

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Attachment

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Q010.32 In the response to 010.26, the applicant identified the following high to low pressure interfaces that require post fire operator actions to prevent overpressurizing the systems:

- a. Pressurizer Power-Operated Relief Valves
- b. Normal Letdown Isolation Valves
- c. Excess Letdown Isolation Valves
- d. Reactor Head and Pressurizer Vent Valves

In order to complete our evaluation, we require a description of the post fire operator actions that include the priority of the operator actions, the number of actions, and the time allowed for each action. In addition, verify that these operator actions are listed in the safe shutdown procedures.

R010.32 CPSES Safe Shutdown systems are designed to preclude spurious operation of high-to-low pressure interface valves. Operator action to prevent these spurious operations is only required for Cable Spreading Room/Control Room fire scenarios and is described below.

Table 4-1.4 of the CPSES Fire Protection Program Review (FPPR) provides a summary of operator actions required at the Hot Shutdown Panel (HSP). To prevent spurious operation of the Train B Pressurizer Power Operated Relief Valve, 1-PCV-456, and the Excess Letdown Isolation Valve, 1-8153, the operator, at the HSP, connects the alternate power supply path to these valves by transferring control to the Hot Shutdown Panel. This transfer is accomplished by changing the position of a series of switches on the HSP.

Table 4-1.3 of the FPPR provides a summary of operator actions required at the Shutdown Transfer Panel (STP). To prevent spurious operation of the Train A Pressurizer Power Operated Relief Valve, 1-PCV-455A, and the Normal Letdown Isolation Valves, 1-8149A, 1-8149B and 1-8149C, the operator, at the STP, connects the alternate power supply path to these valves by transferring control to the Hot Shutdown Panel.

Priority of operator actions and the time allowed for each operator action are given in FPPR Figures 4-2 and 4-1, respectively.

FPPR Table 4-1.1 provides a summary of operator actions required at various locations throughout the plant. To prevent spurious operation of the Reactor Head and Pressurizer Vent Valves, 1-HV-3607, 1-HV-3608, 1-HV-3609 and 1-HV-3610 respectively, the operator disconnects DC power at the 125V DC switchboard in the DC Inverter Equipment Room, by turning off the DC input to the respective distribution panels.

FPPR Figure 4-3 indicates the priority of these actions and the time allowed.

All operator actions are listed in detail in CPSES procedure ABN 803A, "Response to a Fire Affecting Control Room or Cable Spreading Room".