

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

SEP 3 0 1988

Docket Nos. 50-445 and 50-446

APPLICANT: Texas Utilities Electric Company (TU Electric)

FACILITY: Comanche Peak Steam Electric Station (CPSES), Units 1 and 2

SUBJECT:

SUMMARY OF MEETING OR MARCH 17-18, 1988 -COMANCHE PEAK FIRE PROTECTION PROGRAM

On March 17-18, 1988, the staff met with representatives of TU Electric, lead applicant for the CPSES, to discuss (1) the status of TU Electric actions related to open and unresolved items in NRC Inspection Report 50-445/87-22 and (2) information needed by the staff to complete its revised safety evaluation on the fire protection program for the CPSES Units 1 and 2. The meeting notice, agenda, and list of attendees are provided as Enclosures 1, 2, and 3, respectively, to this summary. The handouts used by the applicant are included as Enclosure 4.

The applicant provided the status of each of the open and unresolved items appearing in Inspection Report 50-445/87-22 which documents the results of NRC's site inspection of CPSES Unit 1 during the period October 19-23, 1987. TU Electric's responses to the items are documented in a letter from W. G. Counsil (TU Electric) to NRC dated March 11, 1988 (TXX-88309). Following this status review, the staff and applicant discussed deviations from Appendix A to APCSB 9.5-1 and applicant evaluations (documentation) to demonstrate fire protection program compliance. In addition to pages 16-18 of Enclosure 4, the applicant provided some preliminary information as a handout (Enclosure 5) on numbers and areas of evaluations and deviations.

Following an NRC caucus, TU Electric advised the staff that they planned to submit an FSAR amendment describing recent changes in their evaluation process. These changes have been made since the letters of April 15, 1987 (TXX-6376) and August 4, 1987 (TXX-6582), which provided TU Electric comments and clarifications on the CPSES Fire Protection Program as it estates to NRC's discussion in Section 9.5.1 of Supplement #12 to the Comanche Peak Safety Evaluation Report (SER). The staff advised TU Electric that it wanted to review some evaluations on file at TU Electric demonstrating fire protection program compliance.

Following these discussions, the meeting broke into two working sessions, one group discussed staff information needed for the revised CPSES SER on fire protection and the other group reviewed several engineering evaluations demonstrating fire protection program compliance.

OFOI

In closing discussion, the staff noted that formal review of the applicant's responses to the open and unresolved items from Inspection Report 50-445/87-22 would take place at some time in the future. The staff expressed an intent to spend some time at the site and off site auditing a sample of TU Electric's fire protection program engineering evaluations. The staff also remarked that it would like to see better cross referencing or more direct linking of the engineering evaluations in the Comanche Peak Fire Protection Report to assure a clear licensing basis. TU Electric stated that it intends to submit advanced draft FSAR changes by early May 1988.

original signed by:

Melinda Malloy, Project Manager Comanche Peak Project Division Office of Special Projects

Enclosures:

1. Meeting Notice

2. Agenda

List of Attendees
 TU Electric Handouts

5. Handouts on Engineering Evaluations

cc w/enclosure: See next page

DISTRIBUTION:

Docket Files (50-445/446)

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W. G. Counsil Texas Utilities Electric Company

cc:
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George A. Parker, Chairman Public Utility Committee Senior Citizens Alliance Of Tarrant County, Inc. 6048 Wonder Drive Fort Worth, Texas 76133 W. G. Counsil Texas Utilities Electric Company - 2 - Comanche Peak Elactric Station Units 1 and 2

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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

March 3, 1988

Docket Nos. 50-445 and 50-446

MEMORANDUM FOR:

Christopher I. Grimes, Director Comanche Peak Project Division Office of Special Projects

THRU:

James H. Wilson, Assistant Directo

for Projects

Comanche Peak Project Division Office of Special Projects

FROM:

Melinda Malloy, Project Manager Comanche Peak Project Division Office of Special Projects

SUBJECT:

FORTHCOMING MEETING WITH TU ELECTRIC

Date & Time:

Thursday, March 17, 1988, 1:00 pm - 5:00 pm Friday, March 18, 1988, 8:30 am - 12:00 Noon

Location:

One White Flint North 11555 Rockville Pike

Room 10 B 13

Rockville, MD 20852

Purpose:

For Applicant and Staff to discuss: 1. information related to open and unresolved items in NRC Inspection Report 50-445/87-22, and

information needed by NRC to complete a revised safety evaluation for the implementation of the fire protection

program for Comanche Peak, Units 1 and 2

Participants*:

NRC P. McKee A. Singh Applicant R. Walker J. Seawright R. Layton

M. Mallcy

et al.

T. Storey (contractor) A. Fresco (contractor

> Melinda Malloy, Project Manager Comanche Peak Project Division Office of Special Projects

cc: See next page

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CONTACTS:

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James H. Wilson (301)492-3306

* Meetings between NRC technical staff and applicants for licenses are open for interested members of the public, petitioners, intervenors, or other parties to attend as observers pursuant to "Open Meetings and Statement of NRC Staff Policy," 43 Federal Register 28058, 6/28/78.

W. G. Counsil Texas Utilities Electric Company

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Dr. Kenneth A. McCollom 1107 West Knapp Stillwater, Oklahoma 74075

Dr. Walter H. Jordan 881 West Outer Drive Oak Ridge, TN 37830

- I. INTRODUCTION
- II. COMPLETE
 - · U-04
 - 0 0-04
 - 0-08

III. PLAN COMPLETE WORK IN PROGRESS

- 0-01
- 0-06
- 0-07
- 0-09

IV. PLANNED ACTIONS

- U-02
- @ U-03

V. UPCOMING FSAR AMENDMENT

- 0-05
- 0-02
- U-01
- 0-03
- EVALUATIONS

V!. CONCLUSIONS

NRC/TU ELECTRIC MEETING ON FIRE PROTECTION MARCH 17-18, 1988

ATTENDEES

NRC D. Kubicki J. E. Lyons* M. Malloy P. F. McKee A. Singh J. Wiebe J. H. Wilson R. O. Babb R. C. Howe R. Layton O. Lowe B. K. Riggs J. D. Seawright N. L. Terrel R. D. Walker D. R. Woodlan

Brookhaven National Laboratory (NRC Contractor)

A. Fresco H. Thomas

SAIC (NRC Contractor)

T. Storey

Impell (TU Electric Contractor)

C. A. Banning J. Echternacht J. H. Wawrzeniak

87-22 OPEN/UNRESOLVED ITEMS

- 9 OPEN ITEMS
- 4 UNRESOLVED ITEMS

EVALUATIONS USED AT CPSES

- POSITION
- UP COMING AMENDMENT OF FSAR

nclosure

UNRESOLVED ISSUE 445/8722-U-04

ACCUMULATOR ISOLATION VALVES 1-8808A,B,C AND D ARE MANUALLY OPERATED UTILIZING JUMPERS DURING HOT STANDBY.

RESPONSE:

CPSES PROCEDURE ABN-803A USES MANUAL ACTIONS TO CLOSE
THESE VALVES PRIOR TO RHR CUT-IN. JUMPERS ARE NOT USED TO
CLOSE THESE VALVES.

SCHEDULE:

• COMPLETE

COMMITMENT TO ENSURE THAT ALL FIRE DOOR MODIFICATIONS WILL CONFORM TO UNDERWRITERS LABORATORIES GUIDANCE.

RESPONSE:

- UNDERWRITERS LABORATORIES GUIDELINE FOR ATTRIBUTES
 HAVE BEEN ADDED TO SPECIFICATIONS.
- FIELD VERIFICATION WILL BE PART OF THE POST CONSTRUCTION HARDWARE VALIDATION PROGRAM.

SCHEDULE:

- SPECIFICATION UPDATE
- PCHVP AND RECONCILIATION

COMPLETE SCHEDULES CALL FOR ALL WALKDOWNS BY AUGUST 1988

LACK OF FUSE COORDINATION IN DIESEL GENERATOR
CONTROL CIRCUIT

RESPONSE:

ADEQUATELY COORDINATED FUSES INSTALLED.

SCHEDULE:

COMPLETE

THE REACTOR COOLANT PUMP LUBE OIL COLLECTION SYSTEM SEISMIC ANALYSIS HAD NOT BEEN COMPLETED.

RESPONSE:

SEISMIC QUALIFICATION ACTIVITIES

- WESTINGHOUSE INTERNAL TO MOTOR
- SWEC COLLECTION PIPING AND TANK
- IMPELL COLLECTION COWLINGS

SCHEDULE:

ENGINEER G ANALYSIS - JULY 31, 1988

CONSTRUCTION SCHEDULES CALL FOR MODIFICATIONS BY - OCTOBER 1, 1988

CABLE SPREADING ROOM HALON SUPRESSION SYSTEM
NFPA 12A COMPLIANCE

RESPONSE:

COMPLETE NFPA 12A CODE COMPLIANCE REVIEW.

SCHEDULE:

- CONSTRUCTION SCHEDULES CALL FOR COMPLETION OF CURRENT MODIFICATIONS BY JULY 15, 1988.
- NFPA 12A CODE COMPLIANCE REVIEW IS SCHEDULED FOR AUGUST 5, 1988.

INSTRUMENT AIR VALVES ASSOCIATED WITH A COLD SHUTDOWN REPAIR PROCEDURE WERE POORLY LABELED.

RESPONSE:

IDENTIFICATION AID REQUEST HAS BEEN INITIATED
 TO PROPERLY LABEL VALVES.

SCHEDULE:

INSTALLATION

APRIL 29, 1988

COMPLETE FIRE SAFE SHUTDOWN ANALYSIS MODIFICATIONS REQUIRING THERMO-LAG.

RESPONSE:

 FIRE SAFE SHUTDOWN ANALYSIS IS REVISED AS REQUIRED IN SUPPORT OF PLANT MODIFICATIONS.

SCHEDULE:

THERMO-LAG DESIGN REQUIREMENTS

JUNE 1, 1988

AMPACITY EFFECTS DUE TO THERMO-LAG HAS NOT BEEN COMPLETED.

RESPONSE:

- SDAR RESOLUTION
 - CABLE RESIZING OR REROUTE
 - THERMO-LAG REMOVAL

SCHEDULE:

DCA TO ECE-M1-1700

COMPLETE

AMPACITY ANALYSIS CABLE RESIZING

APRIL 29, 1988

 CONSTRUCTION SCHEDULES CALL FOR COMPLETION OF MODIFICATIONS BY OCTOBER 23, 1988.

UNRESOLVED ISSUE 445/8722-U-02

MANUAL ACTIONS IN THE SAME FIRE AREA AS THE POSTULATED FIRE

RESPONSE:

PROVIDE TABLE OF MANUAL ACTIONS IN THE SAME FIRE AREA AS THE POSTULATED FIRE.

SCHEDULE:

REVISION 4 OF THE FIRE SAFE SHUTDOWN ANALYSIS
 WILL BE AVAILABLE MAY 1, 1988.

UNRESOLVED ISSUE 445/8722-U-03

WCAP AND WESTINGHOUSE CALCULATIONS INDICATE CONSIDERING SPURIOUS SAFETY INJECTION PRT RUPTURE MAY PRECEDE MANUAL OPERATOR ACTIONS INSIDE CONTAINMENT

RESPONSE:

- PROVIDE A REVISED CALCULATION THAT DEMONSTRATES
 - PRT DOES NOT RUPTURE
 - WESTINGHOUSE CALCULATION IS CONSERVATIVE.

SCHEDULE:

CALCULATION IS COMPLETE.

OPER 1 EM 445/8722-0-05

- NEW EMERGENCY LIGHTING REQUIREMENTS RESULTING FROM REVISED FIRE SAFE SHUTDOWN ANALYSIS.
- NRC CONCERNS WITH EMERGENCY LIGHTING ADEQUACY.

RESPONSE:

- REVISION TO IMPELL CALCULATION WILL BE PERFORMED
 AS REQUIRED BY REVISED FIRE SAFE SHUTDOWN ANALYSIS.
- EMERGENCY LIGHTS ARE USED TO ILLUMINATE MANUAL
 ACTIONS REQUIRED TO ACHIEVE AND MAINTAIN HOT STANDBY.

SCHEDULE:

- REVISED CALCULATIONS
- FSAR WILL BE CLARIFIED TO REFLECT
 THAT EMERGENCY LIGHTING IS PROVIDED
 FOR MANUAL ACTIONS REQUIRED TO
 ACHIEVE AND MAINTAIN HOT STANDBY.

MAY 27, 1988
AN UP COMING
FSAR AMENDMENT

UNRATED STEEL HATCHES ARE A DEVIATION TO APPENDIX A TO BTP APCSB 9.5-1

RESPONSE:

THIS EVALUATION WILL BE IDENTIFIED AS A DEVIATION
 IN SECTION 9.5.1.6.2 OF THE CPSES FSAR

SCHEDULE:

THIS CHANGE WILL BE INCLUDED IN AN UP COMING
 AMENDMENT OF THE CPSES FSAR.

UNRESOLVED ISSUE 445/8722-U-01

ADEQUACY OF JUSTIFICATION TO SUPPORT A TWO HOUR RATING FOR SIX STAIRWELL WALLS.

RESPONSE:

 THIS EVALUATION WILL BE IDENTIFIED AS DEVIATIONS IN SECTION 9-5.1.6.2.

SCHEDULE:

UP COMING AMENDMENT OF FSAR

10

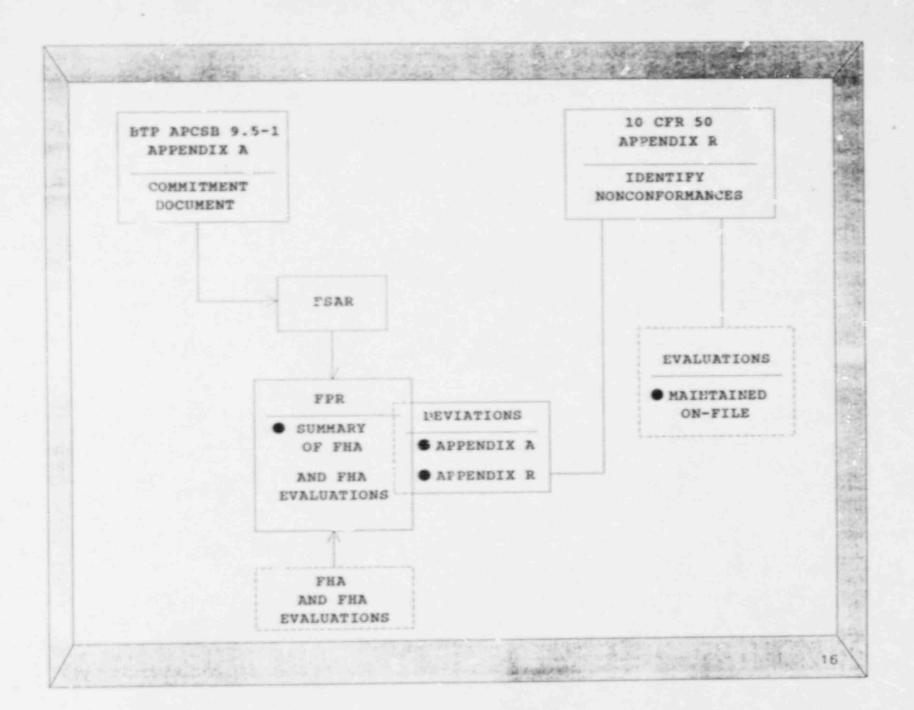
COMMIT TO SEAL CONDUITS FOUR INCHES AND SMALLER ON BOTH SIDES AT THE FIRST OPENING. SEAL INSTALLATION COMPLETION

RESPONSE:

UNRECOGNIZED COMMITMENT UNDER REVIEW

SCHEDULE:

RESPONSE APRIL 29, 1988



FSAR EVALUATIONS WHICH DEMONSTRATE COMPLIANCE WITH APPEND!X A

SECTION	SUPPRESSION	DETECTION	BARRIER
D.1.a2	38	10	36
D.1.c			
F.3		1	•
F.11	80	9	2

FSAR APPENDIX A DEVIATIONS

- 1. METAL HATCH COVERS IN AN UNTESTED CONFIGURATION
- 2. DOOR/DAMPER CONFIGURATIONS OUTSIDE FIRE BARRIER

3. BUS DUCT PENETRATION IN AN UNTESTED CONFIGURATION

4. FLEXIBLE CONDUIT PENETRATIONS IN AN UNTESTED CONFIGURATION

5. GYPSUM BOARD WALLS IN AN UNTESTED CONFIGURATION

EVALUATION VERSES DEVIATIONS PRELIMINARY REVIEW

Today			1984	
Evaluations	Deviations		Evaluations	Deviations
36	10	Suppression	31	31.
78	0(1)	Detection	0(4)	0
82(2)	24(3)	Barriers	39	39(5)
196	34	Total	70	70

Notes:

10000

- (1) 34 Design Modifications Being Implemented
- (2) Engineering Evaluations Justifying the Acceptability of the 24 Deviations is Included Within These Numbers
- (3) Includes Five 20 Foot Separation Deviations and 5 Proposed Additional Deviations
- (4) Evaluation to Code 72E Not Required
- (5) Included Four 20 Foot Separation Deviation and 18 Fire Damper Deviation

BUILDING/ ELEVATION	FIRE AREA/ FIRE ZONE	ROOM NUMBER	III.G.2.b III.G.2.c I/I.G.3 CONCERN	CASE	1984 DEVIATIONS
Auxiliary 790'-6"	AA21a	174 175 179 180	III.G.2.b & 6 III.G.2.b & 6 III.G.2.c		13a-1 13 13 13
Auxiliary 810'-6"	AA216	203 207	III.G.2.b III.G.2.b & c	3 3	13a-2 13a-2
Auxiliary 810'-6"	AA27	198	III.G.2.b	4	13a
Auxiliary 822'-6"	AA21c	209	III.G.2.c	4	29-1
Auxiliary 831'-6"	AA21d	214 226	III.G.2.c III.G.2.c	3 3	13a-3 13a-3
Auxiliary 852'-6"	AA21f	241	III.G.2.b &	3	13a-4 2a
E & C 792'-0"	EA57 EC50 E : 1 EH52 EH53	125 118 119 120 121	III.G.2.c III.G.2.c III.G.2.c III.G.2.c III.G.2.c	3 4 4 4 4	136 2r 2m 2m 2m
E & C 830'-0"	E065	135	111.G.3	4	IVa
E & C 854'-4"	EA73 EA74	150 150a	III.G.2.c III.G.2.c	4 4	2L IVb
Safeguards 790'-6"	SAlc	63	111.G.2.c	3	26
810'-6"	SA142	77N	111.G.2.c	4	21-1
773'-0" & 790'-6"	SB4	64 71	III.G.2.c III.G.2.c	3 3	13d 2g

BUILDING/ ELEVATION	FIRE AREA/ FIRE ZONE	ROOM NUMBER	III.G.2.c III.G.2.c III.G.3 CONCERN	CASE	1984 DEVIATIONS
Safeguards 790'-6"	S84 S82c	70 65 67	III.G.2.c III.G.2.c III.G.2.c	3 4 4	2j 2f • 13d
810'-6"	\$88	79 82	III.G.2.c III.G.2.c	3 3	13d-1 13d-1
810'-6"	SB143	77s	111.G.2.c	3	21
831'-6" & 841'-6"	\$815	94 95	III.G.2.c III.G.2.c	3 3	13d-1 13d
831'-6"	SB144	88	111.G.2.c	3	13d
810'-6"	SD9	83	III.G.2 c	3	2b
831'-6"	SE16	96	III.G.2.c	4	2d
852'-6"	SE18	103	III.G.2.c	4	2c
Safeguards	SE18	104		4	2c

DETECTION EVALUATIONS USED TO JUSTIFY CODE COMPLIANCE

Code Section	Fire Area/Zone	Room No.
2-6.5	AA21a	168
2-6.5	AA21a	169
2-6.5	AA21a	170
2-6.5	AA21a	171 .
2-6.5 2-6.5	AA21a	172
2-6.5	AA21a	173
2-6.5	AA21a	182
2-6.5	AA21b	191
2-6.5	AA21b	192
2-6.5	AA21d	211
2-6.5	DISAA	215
2-5.5	AA21d	217
2-6.5	AA21f	238
2-6.5	AA21f	240
2-6.5	AA21f	242
2-6.5	AA22	207A, 181
2-6.5	AA34	220
2-6.5	AA35	221
2-6.5	AA36	222
2-6.5	AA37	224
2-6.5	AA98	254
2-6.5	AA98	269
2-6.5	AA99b	271A
2-6.5	AA99b	271b
2-6.5	AA100	271 57
2-6.5	SAla	58
2-6.5	SAla	61
2-6.5	SAla	81
2-6.5	S82e S82f	86
2-6.5	S82f	87
2-6.5	AA21b	202
4-3.5.1		208
4-3.5.1	AA21c	
4-3.5.1	AA21c AA21d	209 210
4-3.5.1	SB2a	563
4-3.5.1	AA21a	162
4-3.7.3	AA21f	235
4-3.7.3	AA99b	247
4-3.7.3	AA99d	270
4-3.7.3	EA54	122
4-3.7.3	EA57	125
4-3.7.3	WB104b	275
4-3.7.3	SA142	77N
4-3.7.3	50146	2714

PARRIER EVALUATIONS

Subject	1987	1984
Serv. Water Pumps 20' Sep. Chiller Units 20' Sep. Boric Acid Fumps Boric Acid Sky Tanks Concrete Block Wall Concrete Block Wall Cont. Pen. Seals Miss. Res. Doors Cont. Rm. Missile Resis. Doors Watertight Doors Containment Airlock Cont. Mech. Pen. Seals Cable Spreading Rm. Barrier PRV 20' Separation Cont. RHR Valves 20' Sep. 20' Separation 20' Sep. SK MSIV's HVAC Damper Penetrations	la 1b (FSSA Eval.) (FSSA Eval.) 3a 3a-1 3b 3c 3c-1 3d 3e 3g 3h 4a 4a-1 (FSSA Eval.) 8b Deleted By Upgrade	1a 1b 1c 2e 3a 3a-1 3b 3c-1 3d 3e 3g 3h 4a-1 8b 8c 11a 11b 11c 11d 11e 12a 12b 12c 12d 12e 12f 12g 12h 12i 12m 14
Bus Duct Penetrations Dampers & Doors with Frame Outside Banners	FSAR 9-5.1.6.2 NRF #63, 64, 65, 66, FSAR 9-5.1.6.2	67, 68
Flexible Conduit Penetration	NRF #41, 86 FSAR 9-5.1.6.2 NRF #39, 40	
Metal Hatches with Protective Coating	FSAR 9-5.1.6.2 NRF #35, 36, 37, 38	
Gypsum Board Walls	FSAR 9-5.1.6.2 NRF # 74, 75	