

TUELECTRIC

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File # 10119 (NRCB 92-01)
10012
10035 (GL 92-08)
909.5
Ref. # 10CFR50.48
10CFR50.54

William J. Cahill, Jr.
Group Vice President

April 15, 1993

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 1
DOCKET NO. 50-445
RESPONSE TO GENERIC LETTER 92-08
THERMO-LAG 330-1 FIRE BARRIERS

- REF: 1) TU Electric letter logged TXX-92331 from William J. Cahill, Jr., to NRC dated July 9, 1992; Response to NRC Bulletin 92-01
- 2) TU Electric letter logged TXX-92446 from William J. Cahill, Jr., to NRC dated September 18, 1992; Response to NRC Bulletin 92-01, Supplement 1
- 3) NRC letter from Thomas A. Bergman to William J. Cahill, Jr., dated September 22, 1992
- 4) NRC letter from Thomas A. Bergman to William J. Cahill, Jr., dated October 2, 1992
- 5) TU Electric letter logged TXX-93038 from William J. Cahill, Jr., to NRC dated January 19, 1993
- 6) TU Electric letter logged TXX-93136 from William J. Cahill, Jr., to NRC dated March 23, 1993

Gentlemen:

Generic Letter 92-08, dated December 17, 1992, stated that all addressees are required, pursuant to section 182(a) of the Atomic Energy Act of 1954, as amended, and 10CFR50.54(f), to submit a written report within 120 days from the date of this generic letter. TU Electric has reviewed the actions requested and reporting requirements of this Generic Letter.

TU Electric provided responses for CPSES Unit 2 by reference 5. TU Electric's responses for the Thermo-Lag fire barrier installations at CPSES Unit 1 is provided below.

As stated in response to NRC Bulletin 92-01 and Supplement 1 to the Bulletin (reference 1 and reference 2), Thermo-Lag 330-1 fire barriers are

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

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relied upon to satisfy regulatory requirements and licensing commitments related to 10CFR50.48 at CPSES. Thermo-Lag 330-1 fire barriers are not installed for the sole purpose of achieving physical independence of electrical systems. However, these barriers are relied upon to achieve physical independence of electrical systems as required by Regulatory Guide 1.75 only where such systems requiring physical independence also require protection for ensuring fire safe shutdown capability.

TU Electric is currently participating in a generic effort with the rest of the nuclear industry and Nuclear Management And Resources Council (NUMARC) to ascertain designs and installations of fire barriers which satisfy 10CFR50 Appendix A, General Design Criteria (GDC) 3. The ampacity derating factors used for raceways protected by Thermo-Lag 330-1 fire barriers at CPSES are conservative based on available test data and reference 6 identifies the typical conservatism included in the CPSES design. A final assessment of ampacity derating will be made upon confirming all the installation configurations for CPSES Unit 1.

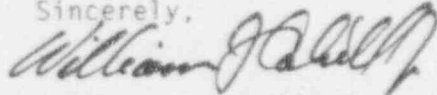
Since there are various options under consideration to resolve the issue, further assessment is needed to determine the approach that satisfies GDC-3 without causing an unjustified impact on the industry. Some of the options being considered include (1) performing additional testing to demonstrate the acceptability of the installed configurations; (2) identifying, testing (if existing CPSES testing is not applicable) and installing "upgrades" for the existing configurations; (3) replacing Thermo-Lag with an alternate fire barrier system; (4) revising the barrier commitments/regulations such that some existing designs would be acceptable and GDC-3 would still be satisfied; and (5) modifying other aspects of the plant's design (e.g., addition of sprinklers or detectors, relocation of raceway, redefining fire area boundaries, etc.). The schedule to complete these actions depends upon the final course of action chosen. For example, rulemaking, which presently appears to be the best course of action, could take longer. TU Electric will continue to work with NUMARC, the nuclear industry and the NRC but a final completion date cannot be established at this time. It is expected the specific test schedules will be provided to the NRC by NUMARC. In the mean time, CPSES Unit 1 has implemented fire watches as compensatory measures in accordance with the Fire Protection Program as noted in reference 1.

By reference 3 and reference 4, the NRC accepted TU Electric's response to the NRC Bulletin 92-01 and its supplement and requested that TU Electric

TXX-93091
Page 3 of 3

inform the NRC when corrective actions are complete. Presently corrective actions are ongoing and test schedules will be provided by NUMARC. As requested by Generic Letter 92-08, TU Electric will confirm in writing upon completion of the required corrective actions.

Sincerely,



William J. Cahill, Jr.

JMK/OB/grp
Attachment

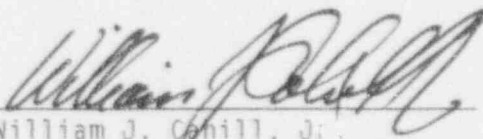
c - Mr. J. L. Milhoan, Region IV
Mr. L. A. Yandell, Region IV
Mr. B. E. Holian, NRR
Mr. T. A. Bergman, NRR
Resident Inspectors, CPSES (2)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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

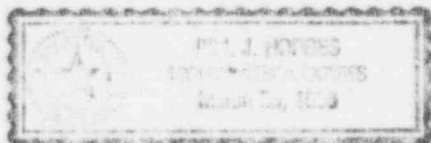
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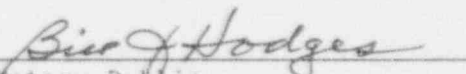
William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the licensee herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this response to Generic Letter 92-08 for the captioned facility; that he is 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 SOMERVILLE)

Subscribed and sworn to before me, on this 15th day of APRIL,
1993.




Notary Public