

TEXAS UTILITIES SERVICES INC.

2001 BRYAN TOWER • DALLAS, TEXAS 75201

TX-3500

File 909.5

April 8, 1982

50-445
50-446

Mr. S. B. Burwell
Licensing Project Manager
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
FIRE BARRIER DERATING



Dear Mr. Burwell:

Portions of the Fire Barriers which make up the boundaries of fire Areas 65, 71, 72, 140 and 141, do not meet the ASTM E119 requirements for a three hour fire rating. However, the design has been accepted by the ANI as being three hour equivalent.

The Fire Barriers in question are shown on the enclosed drawing, FHA-19, and the affected fire areas described below:

<u>FIRE AREA</u>	<u>ROOM DESCRIPTION</u>	<u>HAZARD RATING</u>	<u>PROTECTION/DETECTION</u>
65	Control Room (Common)	Light	Ionization Detection Hose Stations Portable (Water/Halon)
71	Office (Unit 2)	Medium	Ionization Detection Portable (Halon) Hose Station Available
72	Office (Unit 1)	Medium	Ionization Detection Hose Station Available Portable (Halon)
140	Process Monitor Racks (Unit 2)	Medium	Ionization Detection Portable (Halon) Hose Station Available
141	Process Monitor Racks (Unit 1)	Medium	Ionization Detection Hose Station Available Portable (Halon)

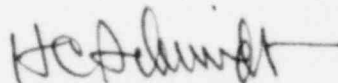
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The fire areas 71, 72, 140 and 141 each contain medium hazards with a less than one (1) hour duration. The fire areas are located in the control room complex and have detection that alarms in the control room. Both portable halon extinguishers and hose stations are available to the areas.

The barriers are constructed of UL listed gypsum board 5/8" thick built three layers deep on each side of metal studs. The joints are staggered for each layer and sealed. This construction meets and exceeds the requirements of two hour rated barriers. It is proposed that the barriers separating these fire areas be derated to two hour barriers in lieu of the three hour rating that is currently required. This derating will permit our design to remain as currently installed, and still maintain a satisfactory level of protection.

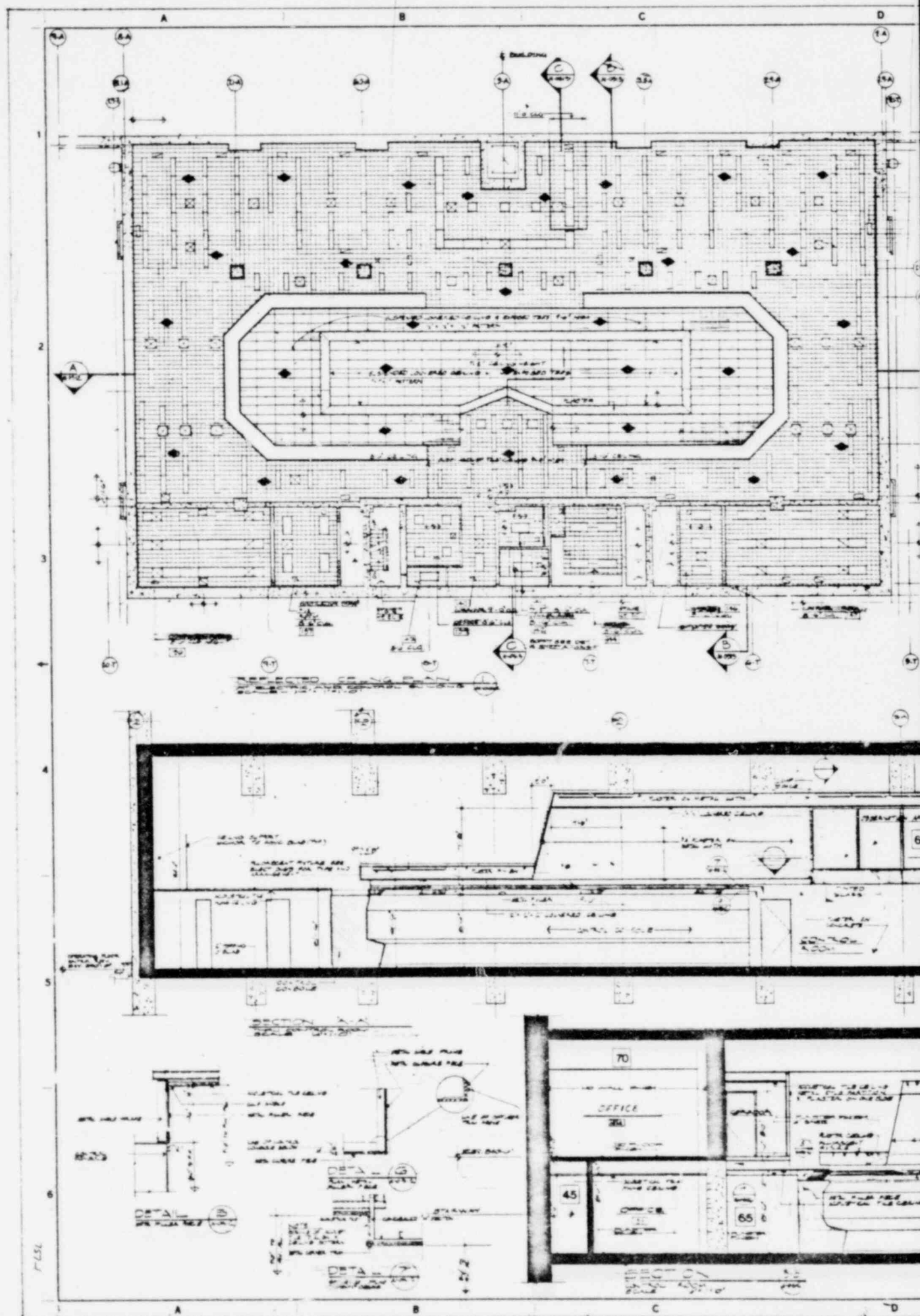
In a related issue, a portion of the fire barrier separating the mezzanine areas (Fire Areas 140, 141) from the Control Room (Fire Area 65) at elevation 840'-6", does not use a design that has been approved as a three hour fire barrier (see attached Brown and Root drawing). The 10th edition of the Gypsum Association Fire Resistance Design Manual, rates a multi-layer gypsum board 2 inches thick as a two hour fire barrier. In the subject area the CPSES design utilizes 3 3/4 inch thick multi-layer, type X gypsum board. Although this design has not been verified by fire test, we believe that it meets or exceeds the required three hour fire rating.

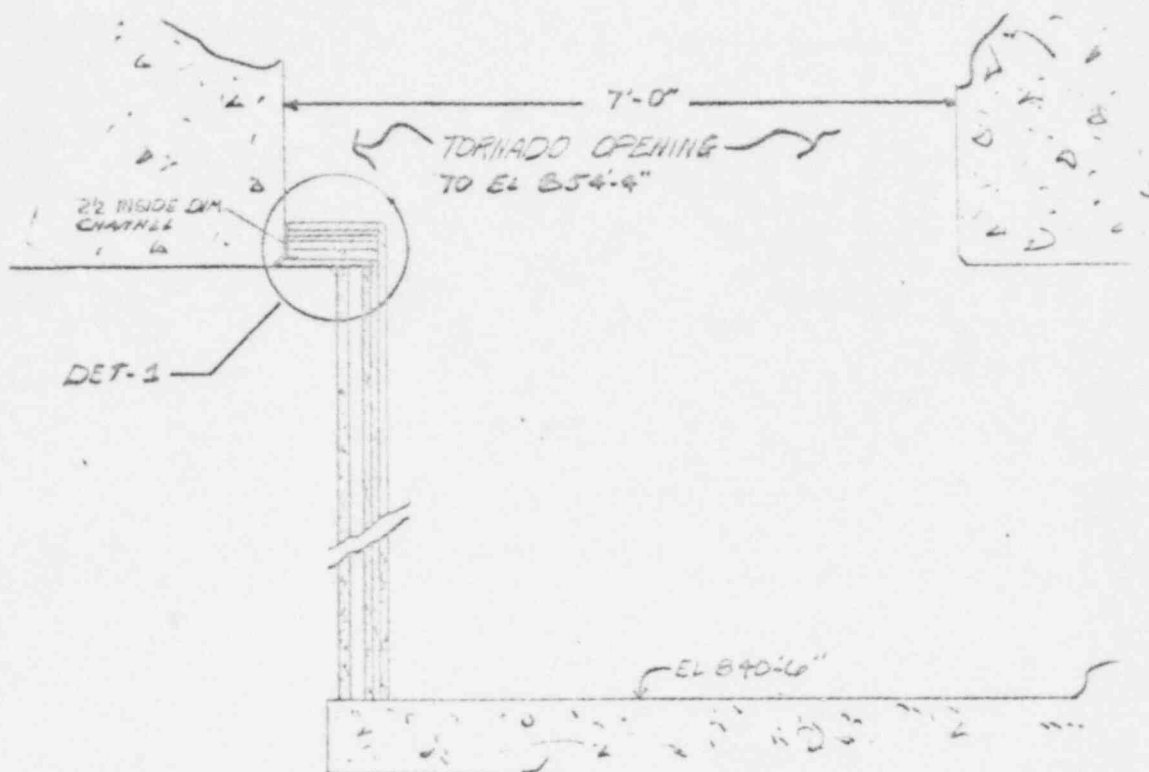
If you have any further comments or questions, please contact this office.



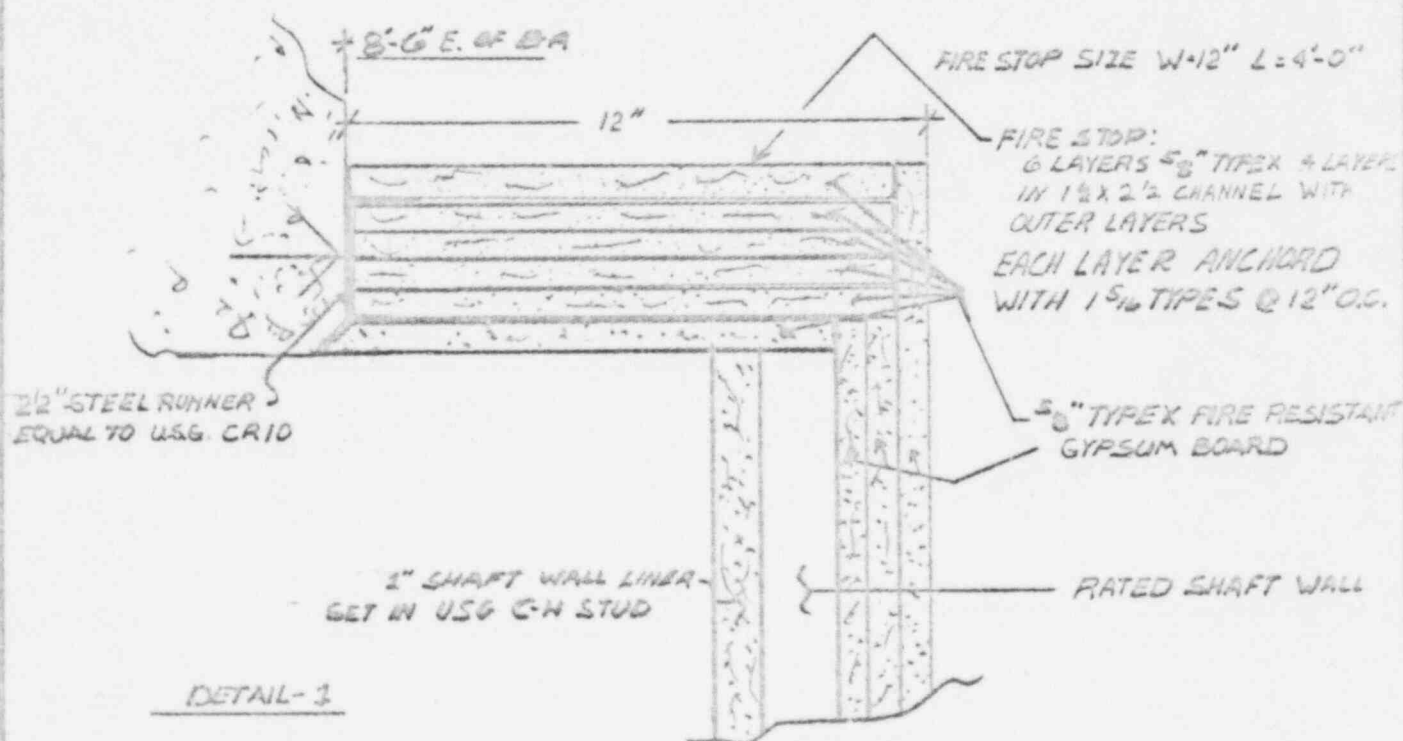
H. C. Schmidt

BSD:grn





FIRE WALL SECT.



Brown & Root, Inc.

HOUSTON, TEXAS



CONT. NO.

35-1105

TITLE

OWNER

LOCATION OF PROJECT

TEXAS UTILITIES SERVICES, INC.

C. P. S. E. S.

GLEN ROSE, TEXAS

DWG. NO.

DRAWN BY

TAW

CHECKED

APPROVED

DATE

SHT.