

TEXAS UTILITIES SERVICES INC.

2901 BRYAN TOWER DALLAS, TEXAS 75201-3050

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File # 909.5

April 8, 1982

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 PROTECTION OPEN ITEMS

Dear Mr. Burwell:

Attached is documentation of a telephone conversation to Greg Harrison, the previous NRC fire protection reviewer, concerning the requirements for Class "A" detection systems. In order to resolve the open item listed on page 9-1 of the SER Supplement 1, and in accordance with the above telephone conversation, Section 9.5-1 of the FSAR will be amended to specify use of Class "A" detection systems in the switchgear rooms.

Should you have additional questions, please contact me.

Sincerely,

J. S. Marshall
J. S. Marshall

JSM:tls
Attachment

13006
5/1/1

820423 0399

Telephone Conversation Record

TRVardaro/JRIsagro, SMMarano/048, GDWeatherford,
RADiMarino, AFAhrens, OUTGOING, 462

GTN-56120 November 6, 1981

9.5
Date: 10/20/81

Time: 11 am

Call by: J. Marshall of TNL (Dallas)
(Name) (Company)

NOV 9 1981

Answer by: ABartlik/GHarrison of G&H/NRC
(Name) (Company)

TEXAS UTILITIES SERVICES INC.
NUCLEAR SERVICES DIV.

Contract No: Texas Utilities Generating Company - G&H 11-2323-001

Subject discussed: Requirement for "Class A" Detection/
Extinguishment Circuits

SUMMARY OF DISCUSSION, DECISIONS AND COMMITMENTS.

Background - Recently, Bob Dacko (TNL) was approached by Greg Harrison (NRC) to determine whether the fire protection system at CPSES utilizes "Class A" wiring where the detector system actuates the suppression system.

A. Bartlik (G&H) was subsequently contacted by B.Dacko concerning this subject and informed B.Dacko that we do not have "Class A" wiring in the above system, nor are we required to by any specific regulation. It was unclear whether the NRC was specifically requiring "Class A" systems in these situations. TNL said they would contact the NRC on this matter.

On October 20, 1981 John Marshall (TNL) contacted Greg Harrison (NRC) and A. Bartlik (G&H) concerning the referenced subject. The conversation is summarized below:

A. Bartlik inquired - what specific guidelines are we in violation of if we do not use Class A wiring in these instances?

Greg Harrison replied - that there were no specific guidelines but this had been requested of other plants.

John Marshall inquired whether Class A wiring would be required where the detection system actuates a suppression system.

10/20/81
11 am

Greg Harrison responded - "Class "A" wiring is required where the detection systems actuate suppression systems in areas of the plant that contain equipment or cabling essential for the safe shutdown of the plant.

John Marshall inquired if there would be any exceptions to this. Greg Harrison replied that we could take exceptions in areas where we could provide adequate justification.

A. Bartlik then outlined specific areas of concern and provided justification for not having "Class A" wiring. Greg Harrison responded to each item of concern and gave his assessment of each situation (this is only a generic response, an official submittal of each area where we take exception must follow to obtain final approval). These areas of concern are outlined below:

1. Diesel generator day tank areas - A. Bartlik stated - Class "A" detection/extinguishment systems are not necessary in these areas because each diesel generator is separated from its redundant counterpart by two three-hour fire barriers. A fire in one day tank area would not affect the operation of the other, therefore, we can afford to have a fire in one day tank area and have its suppression system malfunction and not jeopardize the safe shutdown of the plant.

Greg Harrison stated that he was in agreement with this position and Class "A" wiring would not be warranted in this case.

2. Cable spreadin room - A. Bartlik stated - A backup halon suppression system is installed in the cable spreading room (wet pipe primary system). Since this is only a backup would Class "A" wiring be warranted?

Greg Harrison stated that he felt Class "A" wiring would not be warranted for this situation.

3. Computer rooms, CAS and turbine building areas - A. Bartlik asked if Class "A" wiring would be required in these areas?

Greg Harrison responded - These are not required for the safe shutdown of the plant, therefore Class "A" wiring is not necessary.

10/20/81
11 am

4. Charcoal filter units - A. Bartlik inquired whether Class A wiring was required for the detection/extinguishment circuits in these areas. --

Greg Harrison responded - These units are not in his scope. The fire protection requirements of these units are met provided we meet Reg. Guide 1.52.

5. Switchgear Areas - A. Bartlik stated that these areas contain both Train A and B essential cables, however, we will wrap one train with a 1-hour barrier and provide pre-action sprinkler protection in the affected cables.

Greg Harrison stated that this is an effective approach and Class A wiring may not be necessary.

Greg Harrison then left the conversation. John Marshall and A. Bartlik continued --

It was decided that it would be advisable to install a Class A detection/extinguishment system in the switchgear areas in order to avoid potential problems in the future (this area has minimal preaction sprinkler protection due to the type of electrical equipment in the area).

A. Bartlik stated that he would call R. Babb to obtain his concurrence on this item prior to incorporating this change in the Alison design.

ABm

ABar:lc

ARMS

JTMerritt

LMPopplewell

RBabb

JMarshall (TUSI Dallas)

R E Ballard