

TEXAS UTILITIES GENERATING COMPANY Log # TXX-4151
SKYWAY TOWER * 400 NORTH OLIVE STREET, L.B. 81 * DALLAS, TEXAS 75201 File # 909.5

April 13, 1984

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION
EXCEPTIONS TO SER FIRE PROTECTION
COMMITMENTS

Dear Mr. Youngblood:

SER Supplement 1 section 9.5.1.1 discusses the use of class "A" wiring of detection circuits that initiate suppression systems.

Attached are justifications for two exceptions (7a and 7b) to the use of class "A" wired detection circuits.

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

Sincerely,


H. C. Schmidt

BSD/grr
Attachment

8404190245 840413
PDR ADDCK 05000445
E PDR

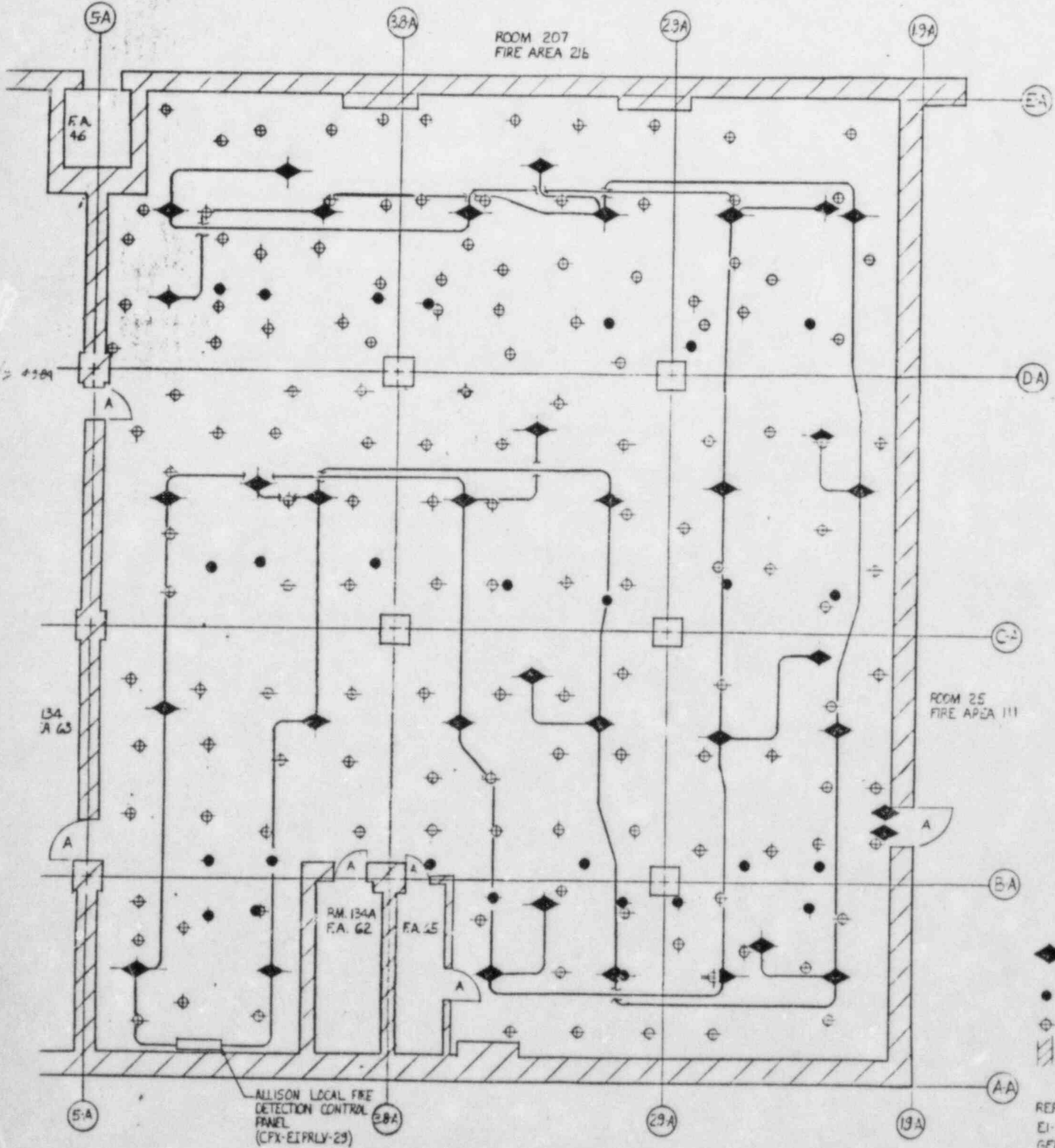
2002
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Justification:

1. An alternate dedicated shutdown system is available to bring the plant to a cold shutdown status independent of the cable spread room.
2. Class B detector circuits are provided with a trouble alarm signal annunciating in the control room for indication of a short to ground or an open circuit.
3. If a trouble alarm annunciates then Technical Specification 3.3.3.8b requires that the problem must be resolved within an hour or a fire watch patrol will be assigned to the Fire Area.
4. Manual override pull stations are available to actuate the Halon System.
5. Cross zone detection circuits are provided with two independent detection circuits that alarm in the control room.
6. A fixed water suppression system is available upon manual actuation of preaction valve.

4N

CABLE SPREADING ROOM
INTERACTION 7A



CABLE SPREADING ROOM
EL. 807-0

ROOM * 133, FIRE AREA 64, INTERACTION 7A

Interation: 7b Diesel Oil Day Tank Rooms

Location:

Bldg.	<u>Safeguard</u>
Elev.	<u>844'-0"</u>
Room/s	<u>99D/99C</u>
F.A.	<u>11/13</u>

References: Grinnell Fire Protection Drawings 54, 55, & 56
Fire Hazard Analysis FHA-3
2323-ICD-M1-2225-8, 8A
2323-EI-2022 Detector locations
2323-EI-2051 Wiring Dwg.

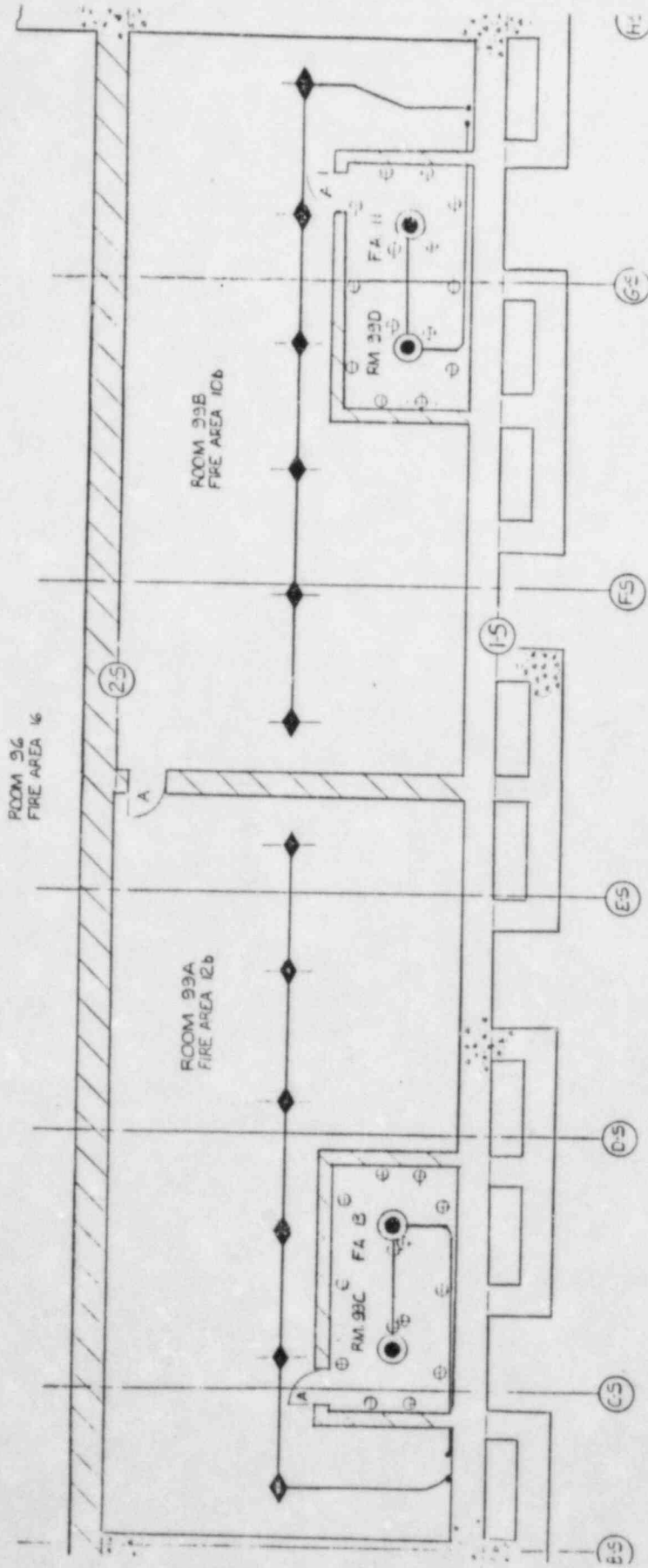
Exception: SER supplement #1 section 9.5.1.1 discusses verbal commitment to provide class A detection for all circuits that initiated suppression systems.

Description: Diesel Oil Day Tank Rooms that service the Emergency Diesel Generators are protected by a water deluge system actuated by Class B detection circuits.

Justification:

1. Class B detector circuits are provided with a trouble alarm signal annunciating in the control room for indication of a short to ground or an open circuit.
2. If a trouble alarm annunciates then Technical Specification 3.3.3.8b requires that the problem must be resolved within an hour or a fire watch patrol will be assigned to the respective fire area.
3. Manual override pull stations are available to actuate the deluge systems.
4. There is no exposure of redundant essential trains within either fire areas 10 and 11 or fire areas 12 and 13 respectively.

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- FIRE WALL
- IONIZATION DETECTORS
- THERMAL DETECTORS
- SPRINKLER HEAD

DIESEL GENERATOR ROOMS

EL. 83'-6"
INTERACTION 7B

REF DWGS EI-2022
GFP-56
FHA-3

Final Design