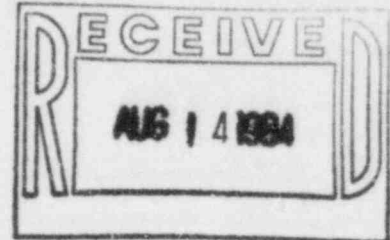


TEXAS UTILITIES GENERATING COMPANY
SKYWAY TOWER • 400 NORTH OLIVE STREET, L.B. 81 • DALLAS, TEXAS 75201

L. F. FIKAR
EXECUTIVE VICE PRESIDENT

August 13, 1984
TXX-4257



Mr. E.H. Johnson, Chief
Reactor Project Branch 1
U.S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76012

Docket Nos.: 50-445
50-446

COMANCHE PEAK STEAM ELECTRIC STATION
CURTAIN FIRE DAMPERS
QA FILE: CP-84-08, SDAR-132
FILE NO.: 10110

Dear Mr. Johnson,

In accordance with 10CFR50.55(e), we are submitting the enclosed report of actions taken to correct a deficiency with the installation of curtain fire dampers without proper provisions for thermal expansion. We have previously submitted interim reports logged TXX-4140, TXX-4188, TXX-4235 dated March 30, 1984, June 4, 1984, and July 20, 1984, respectively.

Supporting documentation is available at the CPSES site for your Inspectors review.

Very truly yours,

L.F. Fikar
L.F. Fikar

LFF/mlm

Attachment

cc: NRC Region IV - (0 + 1 copy)

Director, Inspection & Enforcement (15 copies)
U.S. Nuclear Regulatory Commission
Washington, DC 20555

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S PDR

ATTACHMENT

Curtain Fire Dampers

Description:

The condition of selected fire dampers not operating properly during testing resulted in evaluations performed to determine the cause and correct the problem. These evaluations revealed inadequacies with regard to implementing the manufacturers' recommendations with regard to the UL tested configuration and, therefore, the ability of the curtain fire dampers to function in their service condition is indeterminate.

This condition of inadequacy resulted from the manufacturers' installation criteria not being totally reflected in design documents. This variance precludes consistency between the purchasing specification and design drawings used during installation.

In order to access this issue, detailed design criteria were developed which encompassed all manufacturers' recommendations with specific attention to assure all field conditions were addressed. These design criteria were used to review all damper installations to determine adequacy. In addition, a testing program was undertaken to determine acceptability of specific configurations as installed.

Also, a detailed study of the general fire protection design was initiated to evaluate the impact of this concern in regard to the ability to operate safely and bring the plant to shutdown under fire conditions.

Safety Implications:

The conclusions of these studies have revealed conditions do exist, which if the concern had remained undetected and the dampers failed to operate, the ability to shutdown the plant safely by operating personnel could be jeopardized.

Corrective Action:

The following corrective actions are being implemented:

1. Combination of Fire Areas

Review of the general fire protection plan revealed that fire areas could be combined with no impact on safe shutdown capability, thus deleting the need for a number of fire dampers. The Fire Hazard Analysis (FHA) and drawings have been revised to reflect these changes. This reduced the number of curtain fire dampers needed to one-hundred-fourteen (114).

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2. Rework of Fire Dampers:

Each of the remaining one-hundred-fourteen (114) curtain fire dampers was reviewed to determine if corrective action was required. This review revealed that fifty (50) fire dampers required rework or modification to a tested configuration. Also, eight (8) HVAC penetrations which contained fire dampers are to be deleted. The attached list provides individual equipment tag numbers of these drawings.

Due to the present field conditions, sufficient protection exists for the balance of the HVAC penetrations in the fire walls without the use of fire dampers. Conclusive justification is being provided in the form of deviation requests to the NRC staff.

The above stated corrective actions were reviewed with our NRC Staff Fire Protection Reviewer on August 3, 1984, and agreed to in principle. Formal submittal of all deviations is scheduled for August 17, 1984.

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ATTACHMENT

DAMPERS TO BE REWORKED OR MODIFIED

CPX-VADPFD-001	CPX-VACRFD-001
002	002
005	CPX-VAERFD-054
027	CP1-VADPFD-001
030	013
032	018
033	031
036	038
037	040
041	052
043	053
090	060
092	061
094	070
098	073
099	091
100	093
103	094
104	105
108	CP2-VADPFD-070
109	073
113	095
114	
116	
117	

IN ADDITION: 3 sleeves that presently have no dampers that will require a fire damper to be installed.

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ATTACHMENT

DAMPERS TO BE DELETED

CPX-VADPFD-009

012

019

022

034

091

093

CP1-VADPFD-016