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June 19, 1992

William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
DOCKET NO. 50-446
ROCKBECTOS CABLE

REF: TXX-92232 dated April 7, 1992, from
William J. Cahill, Jr. to the NRC.

Gentlemen:

The NRC requested additional detail about the supports associated with one hour fire-rated cable at CPSES.

As described in the reference correspondence, both fire detection and automatic suppression system coverage are provided where one hour fire-rated cabling is installed, except for three areas. These areas are:

1. Auxiliary Building (790') - Laundry Holdup Area,
2. Safeguards Building (790') - Valve Room 2-066, and
3. Safeguards Building (790') - Stairwell (Room 2-04A).

Pursuant to your request, the "Raceway and Fire Zone R Cable Supports Analysis" has been revised to incorporate the following information about unprotected steel cable trays and support elements:

1. Details of the type and extent of combustibles present in all plant areas where one hour fire-rated cable is installed,
2. Details of the administrative controls which effectively monitor and limit combustibles in the subject areas, and
3. Details of test data associated with non-fire rated cables installed in cable trays containing one hour fire-rated cable.

Consistent with the Unit 1 approach for evaluating exposed supports associated with protected raceways and the guidance provided by Generic Letter 86-10, this analysis demonstrates the following:

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- o In all areas where one hour fire-rated cable is installed and which contain significant quantities of combustible materials, provision is made for fire detection and automatic suppression and administrative controls to ensure design basis fire-induced temperatures will not exceed the critical temperature of the steel support mechanisms as defined by NFPA.
- o In the three plant areas described above, where one hour fire-rated cable is installed without automatic suppression, or provision for fire detection, the inherently low combustible loading and administrative controls ensure that a design basis fire will not result in high enough temperatures to jeopardize the integrity of unprotected cable support mechanisms.

Enclosed is the calculation performed documenting the evaluation. The appropriate areas of the Fire Protection Report are being revised to reflect the above information. If you should have any questions, please call Mr. J. D. Seawright at (214) 812-4375.

Sincerely,

William J. Cahill, Jr.
William J. Cahill, Jr.

By: *Roger D. Walker*
Roger D. Walker
Manager of Regulatory Affairs
for NEO

JDS/tg
Enclosure

c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (2)
Mr. B. E. Holian, NRR