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METROPOLITAN EDISON COMPANY

POST OFFICE BOX 542 PEADING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

August 30, 1973

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Mr. A. Giambusso Deputy Director for Reactor Projects Directorate of Licensing U. S. Atomic Energy Commission Washington, DC 20545

> SUBJECT: THREE MILE ISLAND NUCLEAR STATION UNIT 1 DOCKET NO. 50-289

Dear Mr. Giambusso:

Pursuant to Section 185 of the Atomic Energy Act, as amended, and Section 50.55 of the Commission's regulations, Met-Ed requests that the Commission extend the estimated earliest and latest dates for completion of construction of Three Mile Island Nuclear Station, Unit 1 from the dates presently set forth in the construction permit CPPR-40 as amended (September 30, 1972 and September 30, 1973) to the following dates: February 1, 1974 and February 1, 1975.

Construction progress anticipated in our letter of November 22, 1971 has not been achieved. Numerous changes to the plant and problems encountered on the site, which considered individually may have had little or no effect on schedule, have accumulated to cause significant delay both in release of engineering data and in completion of construction. As has happened with all such projects, many changes have been required to meet evolving AEC guidelines. The required construction and engineering man-hours has increased 24% since November 22, 1971.

Listed below are examples of the problems and changes that have required additional construction time:

- Electrical circuit quantities increased from 12,000 to 17,000 since November 1971.
- (2) Requirements to add orifices and cross connections in the decay heat removal system to comply with the AEC Interim Acceptance Criteria for ECCS.
- (3) Requirements to analyze, fabricate and construct additional restraints in high energy systems external to the reactor building.
- (4) Modifications to the main steam relief values in light of experience at operating reactors. 1585 070



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- (5) Addition of a steam generator chemical cleaning system on the recommendation of the Reactor Manufacturer received since November 1971.
- (6) Implementation of system modifications to accommodate the switch to Westinghouse reactor coolant pumps.
- (7) Development, fabrication, and installation of in-service inspection equipment and the performance of a baseline survey to meet the requirements of Section XI of the ASME Boiler and Pressure Vessel Code.
- (8) Major reduction (20%) of construction force to assure a more effective management control over quality of work as discussed in our letter to Mr. J. P. O'Reilly, AEC, dated December 14, 1972.
- (9) Required modifications to reactor vessel internals, instrument tubes, stator jackets, and position indicator tubes as a result of the Oconee I experience.
- (10) Analysis, equipment development and fabrication, inspection and resolution of thin wall valves in response to AEC letter, dated June 22, 1972.
- (11) Analysis, excavation, and repair of reactor containment vessel ring girder.
- (12) Untimely system turnover for testing with appropriate analysis and packaging of necessary documentation.
- (13) Implementation of requirements for seismic pipe hangers in field run pipe, which required the rerun of considerable pipe.
- (14) Late ordering and delivery of vent and drain valves.
- (15) Implementation of vendor stress relief requirements for reactor coolant piping field weld.
- (16) Delay in installation of piping and equipment restraints in the reactor building.
- (17) Time loss and cleanup effort resulting from effects of a major rain storm occurring in June 1972.

1585 071



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The current estimate of completion is considered to be realistic in view of the advanced stage of completion of the project and the performance experienced in schedule discipline during the past six months.

Very truly yours,

J. G. Miller Vice President

asb

cc: Mr. W. A. Verrochi

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