

POOR ORIGINAL

September 24, 1979

Mr. H. R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> Subject: LaSalle County Station Units 1 and 2 Construction Permit Extension Request NRC Docket Nos. 50-373 and 50-374

Neferences (a): V. A. Moore letter to B. Lee, Jr. dated September 10, 1973 transmitting Construction Permit Nos. CPPR-9 and CPPR-100

> (b): R. S. Boyd letter to B. Lee, Jr. dated May 31, 1978 transmitting extension to Construction Permit Nos. CPPR-99 and CPPR-100

(c): C. Reed letter to O. D. Parr dated February 2, 1979

Dear Mr. Denton:

**Commonwealth Edison Company requests an amendment to the LaSalle County Station Construction Permits CPPR-99 and CPPR-100, as issued by Reference (a) and amended by Reference (b). This request is made pursuant to the provisions of 10 CPR 50.55(b). For the reasons delineated below, we request that the "latest completion dates" be revised to June 30, 1981 and March 31, 1982 for Units 1 and 2 respectively. This amendment does not, in the judgement of the applicant, involve a significant hazard consideration. The revised completion dates reflect a conservative construction schedule allowing some margin for potential future delays, as well as for the installation of additional lateral reinforcing braces between downcomers and additional piping supports in the suppression pool volume required by the Mark II containment studies.

1. The construction schedule has been adversely affected by a labor strike and work stoppage from September 5, 1978 to September 22, 1978 (3 weeks) by the Boilermaker's Union and jurisdictional work stoppages totaling 6 days since June 1, 1978.

Mr. H. R. Denton:

- 2 .

NRC Docket Nos. 50-373/374

September 24, 1979

Moreover, the above work stoppages have resulted in significant skilled manpower losses, primarily in the mechanical and electrical trades, for extended periods following the work stoppage. The consequences of work stoppages of this type, both direct and indirect, were discussed in detail in Reference (c).

- The physical installation of downcomer bracing and T-quencher devices in the suppression pool will have a material effect on the construction schedule. It is important to note that these modifications are being made to comply with the criteria defined by the NRC in NUREG-0487.
- 3. Accommodation of additional NRC criteria in the area of fire protection and containment isolation testing, as well as expanded preoperational testing, contribute both to the delay of previously defined design analysis and the extension of construction activities.

The attached bar graph schedule (Figure 1) indicates the interrelation of the various schedule factors which have contributed to the schedule extension request for Unit 1. Efforts to minimize Unit 1 delays continue to result in reallocation of Unit 2 manpower to Unit 1 work, thus significantly increasing the effect of manpower shortages on the Unit 2 schedule.

It has been stated in the body of this request, and should again be emphasized, that the design evaluation and modifications discussed do not involve a significant hazard consideration. There are no major unreviewed safety questions involved because these issues are being reviewed as a part of the LaSalle FSAR. With regard to the containment design evaluation, the LaSalle County design conforms to the criteria defined in NUREG-0487 with minor exceptions that have been reviewed by the NRC Staff and for which a basis for resolution was presented by the NRC Staff to a meeting of the Advisory Committee on Reactor Safeguards (ACRS) held on September 13, 1979.

Also attached is a proposed "Finding of No Significant Impact" (PONSI) prepared by Commonwealth Edison to address the negative environmental impact of this construction permit extension request.

dr. H. F. Denton:

September 24, 1979

Moreover, the above work stoppages have resulted in significant skilled manpower losses, primarily in the mechanical and electrical trades, for extended periods following the work stoppage. The consequences of work stoppages of this type, both direct and indirect, were discussed in detail in Reference (c).

- 2 -

- The physical installation of downcomer bracing and T-quencher devices in the suppression pool will have a material effect on the construction schedule. It is important to note that these modifications are being made to comply with the criteria defined by the NEC in NUREG-0487.
- 3. Accommodation of additional NRC criteria in the area of fire protection and containment isolation testing, as well as expanded preoperational testing, contribute both to the delay of previously defined design analysis and the extension of construction activities.

The attached bar graph schedule (Figure 1) indicates the interrelation of the various schedule factors which have contributed to the schedule extension request for Unit 1. Efforts to minimize Unit 1 delays continue to result in reallocation of Unit 2 manpower to Unit 1 work, thus significantly increasing the effect of manpower shortages on the Unit 2 schedule.

It has been stated in the body of this request, and should again be emphasized, that the design evaluation and modifications discussed do not involve a significant hazard consideration. There are no major unreviewed safety questions involved because these issues are being reviewed as a part of the LaSalle FSAR. With regard to the containment design evaluation, the LaSalle County design conforms to the criteria defined in NUREG-0487 with minor exceptions that have been reviewed by the NRC Staff and for which a basis for resolution was presented by the NRC Staff to a meeting of the Advisory Committee on Reactor Safeguards (ACRS) held on September 13, 1979.

Also attached is a proposed "Finding of No Significant Impact" (FONSI) prepared by Commonwealth Edison to address the negative environmental impact of this construction permit extension request.

