

Detroit

EDISON

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Harry Tauber  
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August 26, 1980

DE File EF 2 - 49,889

NRC Docket No. 50-341

Mr. Darrell G. Eisenhut, Director  
Division of Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington DC 20555

Dear Mr. Eisenhut:

Subject: Best Estimate for Construction Completion Date

This is in response to your letter dated July 11, 1980 requesting that Detroit Edison provide its best estimate of the completion date for Fermi 2.

Your letter indicates that "...a number of recent slippages in applicants' construction completion schedules..." is the basis for your request for an updated schedule. Detroit Edison would like to point out some key issues with respect to construction progress and schedules.

Most construction items within the plant are not slipping. A few items only are experiencing an extended time for construction completion mainly because of new regulations. Many systems and structures are now 100 percent complete and many others are nearing completion. It is important, therefore, that the NRC actively resume its review function.

Acknowledging that the NRC is limited in proceeding with casework activities and the issuance of operating licenses because of limited manpower resources, it is noteworthy that the NRC licensing schedule presented by Chairman J. F. Ahearne before the Subcommittee on Energy and Water Development, Committee on Appropriations will not be properly supported by the NRC staff. Also, Detroit Edison regards this present NRC schedule to be inadequate because it allows insufficient time for a contested hearing on Fermi 2 before the Atomic Safety and Licensing Board.

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Mr. Darrell G. Eisenhut  
August 26, 1980  
EF 2 - 49,889  
Page 2

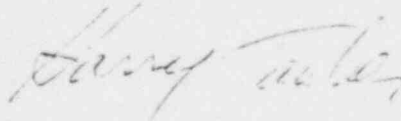
Your request for the latest and best estimate for completion causes concern because a published date should be immaterial now that Detroit Edison has agreed to support licensing activities with the five other utilities comprising the Licensing Review Group (LRG). As agreed, your Safety Evaluation Report (SER) needed prior to the issuance of an operating license for LaSalle would be used to resolve common issues for the other plants (Zimmer, Susquehanna, Shoreham and Hanford 2), including Fermi 2. NRC resources or priorities for this effort should not be decreased because of changes in the completion date for Fermi 2 or other plants in the group. Detroit Edison believes that increased NRC resources should continue to be applied to the licensing efforts for these six plants.

A key element in construction progress and plant completion is tied to present and future potential changes in the plant as required by the NRC staff. These changes may seriously affect Detroit Edison's best estimate for completion as it will the other LRG BWR's. For example, the North Anna SER (July 28, 1980) Supplement Number 11 states, "The licensee will be required to meet the requirements of NUREG-0696, 'Functional Criteria for Emergency Response Facilities' to be published for comment in July or August, 1980." Detroit Edison's best estimate, therefore, is very much dependent upon what future requirements the NRC staff will mandate prior to the issuance of the operating license.

After careful review of the facts and uncertainties influencing the response to your question, Detroit Edison currently estimates the latest fuel load date for Fermi 2 to be November 1982.

In light of the preceding discussion, NRC active review of the Fermi 2 (1974) application for an operating license should resume with the objective of your publishing the SER by March 1981. This would allow sufficient time for all licensing activities to be completed and the operating license issued when required.

Sincerely,



CC: L. L. Kintner