Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 993F? (509) 372-5000

July 21, 1981 G01-81-206 NS-L-GCS-81-199

Docket Nos.: 50-460 0-513

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

Dear Mr. Denton:

Subject:

Washington Public Power Supply System Nuclear Projects No. 1 & 4 (WNP-1/4) Extension of Construction Completion Dates

The Supply System requests amendments to Construction Permit Nos. CPPR-134 and CPPR-174 for WNP-1 and WNP-4 to extend the "latest completion dates" for WNP-1 and WNP-4, pursuant to 10CRF50.55(b). Construction Permit No. CPPR-134 currently specifies January 1, 1982, as the latest date for completion of construction for WNP-1 and Construction Permit No. CPPR-174 currently specifies December 1, 1985, as the latest date for completion of construction for WNP-4. For the reasons set forth below, the Supply System submits that good cause exists to extend the latest completion date for construction permit CPPR-134 to June 1, 1986, and to extend the latest completion date for construction permit CPPR-134 to June 1, 1986.

Subsequent to the issuance of the construction permits delays in the construction of WNP-1 and WNP-4 have occurred. The primary factors causing these delays are as follows:

- Changes in the scope of the projects including increases in the amount of material and engineering required as a result of regulatory actions, in particular those subsequent to the TMI-2 accident.
- Construction delays and lower than estimated productivity which resulted in delays in installation of material and equipment and delays in completion of systems necessitating rescheduling of preoperational testing.

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- 3. Strikes by portions of the construction work force.
- 4. Changes in plant design.
- 5. Delays in delivery of equipment and materials.

In estimating new completion dates for WNP-1 and WNP-4, the Supply System has carefully examined the impact of the delays described above on the construction schedules for both units. Also, while the official completion dates are December 1985 and December 1986 for WNP-1 and WNP-4 and while we hope to improve on these dates, the June 1, 1986 and June 1, 1987, latest construction completion dates we are requesting for the purpose of construction permit duration reflect a reasonable allowance for uncertainty, which is appropriate given the potential for continued regulatory changes and labor difficulties.

Since these amendments involve no significant safety or environmental considerations, the Supply System requests that the Commission dispense with advance notice of the amendment, pursuant to Section 189(a) of the Atomic Energy Act of 1954, as amended. 42 USC 2239(a)

Accordingly, the Supply System requests, pursuant to 10CRF50.55(b) that the Nuclear Regulatory Commission amend Construction Permit No. CPP 128 to specify June 1, 1986 as the latest date for completion of WN amend Construction Permit No. CPPR-174 to specify June 1, 1987 and latest date for completion of WNP-4.

The request regarding amendment of Construction Permit No. CPPR-134 is a Class II amendment, as it has no safety or environmental significance and is a matter of formality and administrative in nature. The request regarding amendment of Construction Permit No. CPPR-174 is a Class I amendment as it is a duplicate of an amendment for a second essentially identical unit at the same site where both proposed amendments are received, processed and issued at the same time. See 10CRF170.22. Enclosed, therefore, are two checks. One is in the amount of \$1,200 for the Class II Amendment and the second in the amount of \$400 for the Class I Amendment.

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The Supply System recently filed a request with the Commission for a full refund of all fees paid to the NRC by the Supply System, and noted its intent to pay any future fees under protest until that request is resolved (see letter of R.L. Ferguson to Chairman Palladino, July 13, 1981). Accordingly, we hereby remit the fees prescribed by 10CRF170.22 under protest and subject to refund upon resolution of our request.

Very truly yours,

G. D. Bouchey, Director Nuclear Safety

GDB:pp

Attachment - Notarization

cc: CR Bryant, Bonneville Power Administration 399
R Hernan, Nuclear Regulatory Commission
AW Medici, United Engineers & Constructors, PA - 04U3
NS Reynolds, Debevoise & Liberman
FDCC - 899

EXTENSION OF CONSTRUCTION COMPLETION DATES

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STATE OF WASHINGTON)	2	Subject:	-
COUNTY OF BENTON	SS		

I, G. D. BOUCHEY, being duly sworn, subscribe to and say that I am the Director, Nuclear Safety, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATED July 2', 1981, 1981

G. D. BOUCHEY

On this day personally appeared before me G. D. BOUCHEY to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 21 st day of the 1981.

Motary Public in and for the State of Washington

Residing at Jannewick