



**Commonwealth Edison**

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Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

March 2, 1982



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

Subject: LaSalle County Station Unit 2  
Construction Permit Extension Request  
NRC Docket No. 50-374

- References (a): V. A. Moore letter to B. Lee, Jr. dated September 10, 1973 transmitting Construction Permit No. CPPR-100.
- (b): R. S. Boyd letter to B. Lee, Jr. dated May 31, 1978 transmitting extension to Construction Permit No. CPPR-100.
- (c): O. D. Parr letter to D. L. Peoples dated January 17, 1980 transmitting extension to Construction Permit No. CPPR-100.
- (d): D. L. Peoples letter to H. R. Denton dated September 24, 1979.

Dear Mr. Denton:

Commonwealth Edison requests an amendment to the LaSalle County Station Construction Permit CPPR-100 as issued by Reference (a) and amended by Reference (b) and (c). This request is made pursuant to the provisions of 10 CFR 50.55(b). For the reasons delineated below, we request that the "latest completion date" be revised to September 30, 1983 for LaSalle County Unit 2. This amendment does not in the judgement of the applicant, involve a significant hazard consideration. The revised completion date reflects a conservative estimate of actual construction and testing completion allowing some margin for potential future delays. The specific bases upon which this request for extension is founded, are the following:

1. Concentration of resources on completion of Unit #1 construction and testing. This effect is judged to have resulted in adding as much as nine additional months to the estimate provided in Reference (d).

*Booke w/heck  
5/1 \$1,200*

2. Potential construction delays resulting from unforeseen new and/or replacement equipment delivery difficulties which could effect critical path preoperational testing. As a result of no domestic nuclear plant orders in the last few years, some vendors are no longer providing nuclear quality material and equipment. In some cases original replacement parts must be ordered from new vendors resulting in long delivery schedules. It is judged that such material and procurement problems could add from three to six months to the construction completion date provided in Reference (d).
3. Accommodation of additional NRC criteria related to preoperational testing in numerous areas including vibration monitoring, leak rate testing, response time testing and electrical system load verification. Our Unit 1 preoperational testing experience in fulfilling the NRC criteria path shows some of our initial scheduled time durations were optimistic. A revised assessment of Unit 2 preoperational testing leads us to believe a six month extension of the critical path schedule in Reference (d) is required.
4. Uncertainty attributable to potential expansion of NRC requirements beyond that presently identified in the LaSalle County Safety Evaluation Report, NUREG-0519 dated March, 1981. This uncertainty has been assigned a construction completion delay estimated at four months. This value is judged to be realistic in light of our experiences on Unit 1.

The attached bar graph schedule indicates the interrelation of the various schedule factors that have contributed to the schedule extension request for Unit 2.

It should again be emphasized that the factors addressed in this request do not involve a significant hazard consideration. There are no major unreviewed safety questions involved as evidenced by the statement of the Advisory Committee on Reactor Safeguards (ACRS) in the letter from J. Carson Mark to J. M. Hendrie dated April 16, 1981.

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.

Three (3) signed originals and thirty-seven (37) copies of this submittal are provided for your review and approval.

Enclosed is a check in the amount of \$1,200.00 submitted in accordance with the fee schedule defined in Section 170.22 of 10 CFR 170, in support of this construction permit extension request.

Very truly yours,

*L. O. DelGeorge*

L. O. DelGeorge  
Director of Nuclear Licensing

lm

cc: Mr. R. G. Page - Uranium Fuel Licensing Branch  
Division of Fuel Cycle and  
Material Safety

NRC Resident Inspector - LSCS

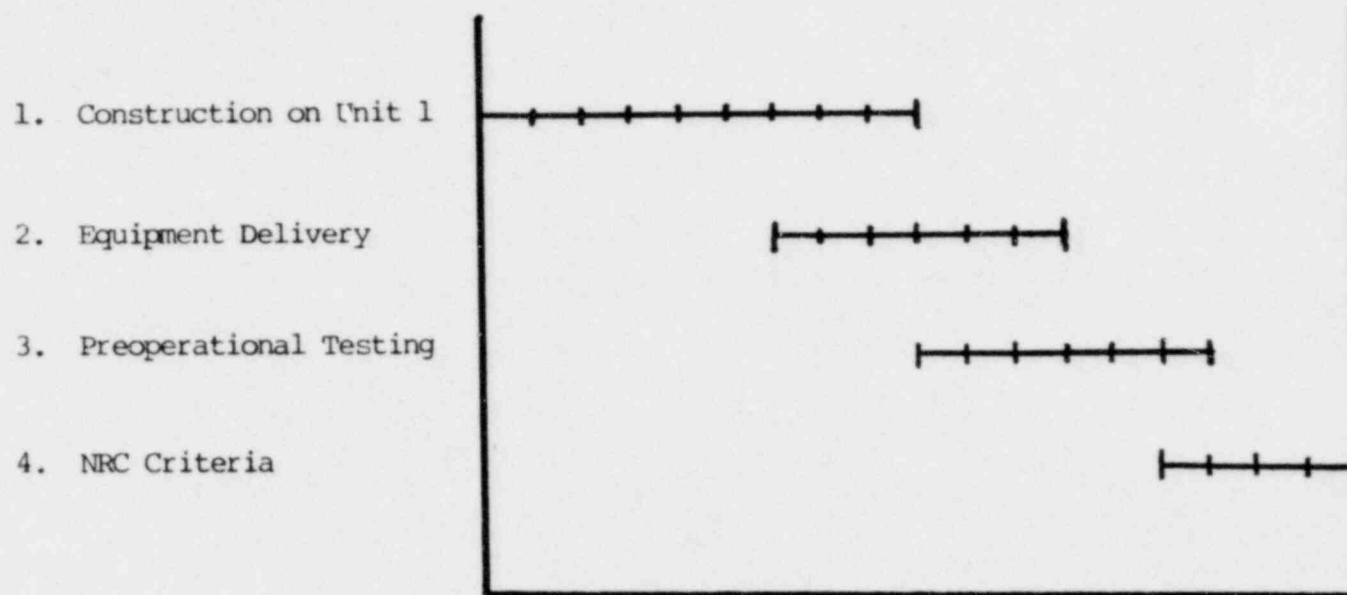
SUBSCRIBED and SWORN to  
before me this 2nd  
day of March, 1980

*[Signature]*  
\_\_\_\_\_  
Notary Public

2035N

Existing Permit  
Latest Completion Date  
March 31, 1982

Revised Permit  
Latest Completion Date  
September 30, 1983



LaSalle County Station Unit 2

Schedule Delay (Months)

ENVIRONMENTAL IMPACT APPRAISAL  
SUPPORTING THE REQUEST FOR EXTENSION OF THE  
DATE FOR COMPLETION OF CONSTRUCTION OF  
LASALLE COUNTY STATION, UNIT 2 (CPPR-100)  
COMMONWEALTH EDISON COMPANY  
DOCKET NO. 50-374

1. Description or proposed Action

The action requested is the issuance of an ORDER pertaining to the LaSalle County Station (LSCS), Unit No. 2. The ORDER would extend for 18 months the latest date for completion of Unit No. 2.

The construction permit for Unit 2 (CPPR-100) would be extended from a latest completion date of March 31, 1982 to September 30, 1983.

2. Summary Description of the Probable Impacts of the Proposed Action

The environmental impacts associated with construction of LSCS have been previously addressed in the NRC staff's final environmental statement, construction permit stage (FES-CP) issued February, 1973, addressed in the NRC staff's final environmental statement, operation license stage (FES-OL) issued November, 1978, and determined by the Atomic Safety and Licensing Board in their Initial Decisions dated September 5, 1973 (6 AEC 645) and March 18, 1974 (7 AEC 289), and the Atomic Safety and Licensing Appeal Board in their decisions of October 19, 1973 (ALAB 153, 6 AEC 821, affirmed 6 AEC 1072), and April 15, 1974 (ALAB 193, 7 AEC 423).

The Atomic Safety and Licensing Board identified in the Initial Decision the following five major effects due to construction:

- A. Dredging and construction of facilities on the Illinois River will have an impact on the river bottom and channel.
- B. The construction of the cooling lake and the station itself will involve major earthmoving and will generate some noise and dust.
- C. Short-term traffic problems may occur.
- D. Ancillary activities such as transmission line and rail spur construction, and the increased use of local roads may create minor impacts.

E. Station-related construction will temporarily remove ninety acres of land from agricultural production.

The first two construction related effects noted above have already occurred. The dredging and construction of river facilities were completed in 1975. The major earthmoving activities were completed in 1976. Therefore, because these major construction effects have already occurred, the construction permit extensions will not add to impacts in these areas.

In respect to the third effect, the construction work force has already peaked, thus, local community-related impacts (such as traffic congestion) have already reached a maximum and are now declining.

In relation to the fourth construction effect noted above, the rail spur has been completed, station-related heavy components have already been transported to the site and all transmission line construction has been completed.

The last effect (#E) mentioned above will generally be postponed as a result of the construction permit extensions. However, 120 acres of land on the station site have already been returned to agricultural production.

In summary, the environmental impact resulting from extending the construction permit will be either a postponement or continuation of certain identified and evaluated impacts mentioned above (effects C, D, and E above) or have already occurred (effects A and B).

The Appeals Board highlighted another impact due to construction: The creation of the cooling lake which resulted in the removal of approximately 2058 acres of arable farmland from agricultural use. This impact has already occurred, and the extension of the construction permits, therefore, will result in no further adverse effect relative to changes in land use.

Subsequent to construction of the cooling lake, significant erosion was identified downstream from the station site along the banks of a drainage creek called Armstrong Run. The banks of the run have been reshaped and reseeded and vegetation has been established on the dike that insures maximum flows in the run will be less than preconstruction levels. This construction effect has been corrected and should not recur.

On May 23, 1979, in a letter from C. Reed to O. Parr, the NRC was notified of the existence of erosion on certain portions of the make-up and blowdown water pipeline corridor. Reshaping of the affected areas occurred in August of 1979, followed by seeding in September. The construction permit extensions would not result in any additional erosion impacts.

The blowdown line ruptured on January 23, 1980 at Station 125 + 00 (about 2 miles from the Illinois River). The water flowed across Edison property damaging a driveway and depositing silt in a drainage ditch.

The pipeline was repaired by February 12, 1980. The driveway was repaired and ditch dredged in March, 1980. The pertinent areas were reseeded in June 1980.

This construction effect has been corrected and should not recur.

The monitoring program at groundwater observation wells around the cooling pond have indicated a general rise in water levels. We will continue to monitor these wells until it has been determined if it is a construction effect or not. If it is a construction effect, methods to alleviate the situation will be investigated. In as much as the cooling pond has been filled since 1978, the effect, if any, will have already occurred and extension of the construction permit would not result in any additional impacts.

### 3. Conclusion and Basis for Finding of No Significant Impact

On the basis of the above, it is concluded that there will be no significant impacts attributable to the requested action other than those already predicted and described in the FES-CP issued in February, 1973, the FES-OL issued in November, 1978, the Board's Initial Decisions issued in September, 1973 and March, 1974, subsequent Appeal Board Decisions, or described herein.