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TU ELECTRIC

February 3, 1992

William J. Cahill, Jr.
 Group Vice President

U. S. Nuclear Regulatory Commission
 Attn: Document Control Desk
 Washington, D. C. 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2
 DOCKET NO. 50-446
 REQUEST FOR EXTENSION OF CONSTRUCTION PERMIT
 NO. CPPR-127

- REF: 1) USNRC letter, Christopher I. Grimes to
 William G. Council dated November 18, 1988,
 "Order Extending the latest construction
 completion date of Comanche Peak Unit 2."
 2) TU Electric letter TXX-88482 from W. G. Council
 to USNRC dated June 6, 1988.

Gentlemen:

By this letter, Texas Utilities Electric Company (TU Electric) applies for an extension of Construction Permit CPPR-127, under the provisions of 10CFR50.55(b), for Comanche Peak Steam Electric Station, Unit 2. As established by Commission Order on November 18, 1988 (Reference 1), the latest completion date presently reflected in CPPR-127 is August 1, 1992. TU Electric hereby requests that the latest completion date be extended to August 1, 1995.

TU Electric submits that good cause exists for the construction permit extension. As discussed in Reference 2, TU Electric's previous request for an extension of the latest construction completion date was predicated upon an estimated one-year suspension in construction, beginning in April 1988. The purpose of the suspension was to allow TU Electric to concentrate its resources on completion of Unit 1. Unit 1 was not licensed until February 1990, and TU Electric did not resume significant design activities for Unit 2 until June 1990. Thus, the period of suspension lasted longer than was estimated in Reference 2. This longer period reflected the time needed to complete construction and startup of Unit 1. In Reference 1, the NRC previously found that there was "good cause" for suspension of construction of Unit 2 to allow concentration of resources on the completion of Unit 1. For the same reason, the additional period of suspension constitutes good cause for TU Electric's current request for extension.

The requested extension of the latest date for completion of construction is for three years, from August 1, 1992 to August 1, 1995. TU Electric currently estimates completion of construction in December 1992. An extension until

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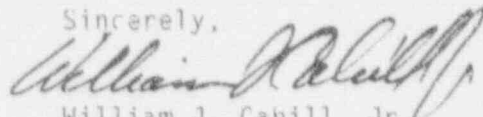
August 1, 1995 will provide for a period of continuous construction and testing plus a contingency period for any unanticipated delays. As such, this extension is "for a reasonable period of time" in accordance with 10CFR50.55(b).

Finally, the requested extension of the construction permit involves no significant hazards because it does not involve a significant increase in the probability or consequences of an accident, create the possibility of an accident of a type different from any previously evaluated, or involve a significant decrease in the margin of safety. Rather, it simply extends the completion date. Accordingly, TU Electric requests that the Staff dispense with prior notice of issuance of the extension, in accordance with 10CFR50.92(a).

A proposed Environmental Impact Appraisal prepared by TU Electric is attached. This appraisal supports a determination that the construction permit extension will result in no significant environmental impact.

In accordance with 10CFR170.21, TU Electric must pay the full cost for Staff review of the construction permit extension application. Payment will be made upon notice by the Commission in accordance with 10CFR170.12.

Sincerely,



William J. Cahill, Jr.

RSB/vld
Attachments

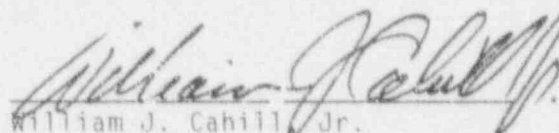
c - Mr. R. D. Martin, Region IV
Resident Inspectors, CPSES (?)
Mr. M. B. Fields, NRR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
Texas Utilities Electric Company) Docket Nos. 50-446
)
(Comanche Peak Steam Electric)
Station, Unit 2))

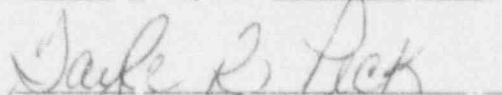
AFFIDAVIT

William J. Cahill, Jr. being duly sworn, hereby deposes and says that he is Group Vice President, Nuclear of TU Electric, the lead Applicant herein; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this request for the extension of the latest construction completion date presently reflected in Construction Permit No. CPPR-127 for the captioned facility; that he is familiar with the content thereof; and that the matters set forth therein are true and correct to the best of his knowledge, information and belief.


William J. Cahill, Jr.
Group Vice President, Nuclear

STATE OF TEXAS)
)
COUNTY OF DALLAS)

Subscribed and sworn to before me, on this 3rd day of February, 1992.


Notary Public

ENVIRONMENTAL IMPACT APPRAISAL
SUPPORTING THE REQUEST FOR EXTENSION OF
COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 2
CONSTRUCTION PERMIT CPPR-127
DOCKET NO. 50-446

I. Description of and Need for Proposed Action

The action requested is the issuance of an extension to the construction permit for Comanche Peak Steam Electric Station (CPSLS), Unit 2. This would extend for 36 months the latest date for completion of Unit 2. The need for the proposed action arises from the requirement in NRC regulations (10CFR50.55(a)) that each construction permit state the latest date for completion, and from the fact that construction and preoperational testing have not yet been completed. For approximately 25 months, TU Electric redirected its resources principally to Unit 1 in order to complete construction and startup of that unit. As a result, additional time is now needed to complete construction of Unit 2.

II. Description of the Probable Environmental Impacts of the Proposed Action

The environmental impacts associated with construction of the Comanche Peak facility are associated with both units and have been previously evaluated and discussed in the NRC Staff's Final Environmental Statement (FES), issued in June 1974, which covered the construction of both units. One of the environmental impacts, groundwater withdrawal, is the subject of a construction permit condition and will be discussed further below.

Since the proposed action concerns the extension of the construction permit, the impacts involved are all non-radiological and are associated with continued construction. There are not new significant impacts associated with the proposed action. All activities will take place within the facility, will not result in impacts to previously undisturbed areas, and will not have any significant additional environmental impact. However, there are impacts that would continue during the completion of facility construction.

The FES identified four major environmental impacts due to the construction of both units. Three of the four major environmental construction impacts discussed in the FES have already occurred and are not affected by this proposed action:

- o Construction-related activities have disturbed about 400 acres of rangeland and 3,228 acres of land have been used for the construction of Squaw Creek Reservoir.
- o The initial set of transmission lines and the additional planned line as discussed in the FES are completed.
- o Pipelines have been relocated and the railroad spur and diversion and return lines between Granbury and Squaw Creek Reservoir have been completed.

The fourth major environmental impact addressed in the FES is the community impact which would continue with the extended construction of the facility. The requested extension only involves impacts previously considered, with none of these impacts greater than those previously considered. These impacts flow principally from the prolonged presence of construction workers into the surrounding communities in Hock and Somervell counties. The current work force level of approximately 6650 represent the total on-site work force (i.e., TU Electric and contract personnel supporting Unit 1 and 2 activities). This number represents a decline of 850 from the peak work force on-site at the end of the construction phase of Unit 1, and will continue to decline as Unit 2 construction nears completion. It should be noted that 85% of the total work force are contractors and consultants who do not live in the area and use only temporary quarters during the work week. (i.e., even while they are present there are no extended impacts associated with the arrival of families or services necessary to support permanent residents). In sum, the only community impacts which would accompany this extension would be those which extend the total time the local community is affected by the present demand for public services. As such, the maintenance of the work force level for the additional months requested should not result in significant additional impacts. In addition, it should be noted that only 4500 personnel are associated full time with the Unit 2 Construction Permit extension, and the remainder are required to support the operation of Unit 1 or split their time between Units 1 and 2.

Another impact, the subject of a construction permit condition, is groundwater withdrawal. At the present time, non-potable water for construction activities is being supplied from treated lake water. The construction permit for Comanche Peak Unit 2 includes a condition that the annual average groundwater withdrawal rate not exceed 40 gpm. This will confirm that current groundwater withdrawal rates are within the limit established by the construction permit. Thus, continued construction will have no significant impact on groundwater. As background, the NRC Staff's environmental impact appraisal for Amendment 2 of Construction Permit Nos. CPPR-126 and CPPR-127 was based upon a maximum withdrawal of 6.57×10^8 gallons during the construction period of five years at a rate of two hundred fifty (250) gallons per minute (see TUGCO letter TXX-3547 from R. J. Gary to H. R. Denton dated July 26, 1982). For the following reasons the Staff's appraisal is still unchanged for the total groundwater to be withdrawn through August 1, 1995. First, as of July 1, 1987, approximately 5.12×10^8 gallons of groundwater had been withdrawn (see TU Electric letter TXX-6589 from W. G. Council to the NRC dated July 22, 1987). Second, the measured groundwater withdrawal from July 1987 through December 1991 was measured at approximately 56.7 million (0.57×10^8) gallons. Third, even assuming a maximum groundwater withdrawal of forty (40) gallons per minute from January 1, 1992 through August 1, 1995, for all groundwater sources (this withdrawal rate is authorized by Amendment 6 to Construction permits CPPR-126 and CPPR-127), there would be approximately 75.3 million (0.75×10^8) gallons withdrawn. Totaling the above, results in a conservative estimate of the total groundwater withdrawal of 6.44×10^8 gallons for the period through August 1, 1995, which is less than the 6.57×10^8 gallons originally evaluated and authorized by the NRC staff.

As required by the construction permit, environmental monitoring has been conducted.

In the past, a number of groups have identified concerns regarding the potential environmental impacts of several closed landfills at CPSES that contain relatively small amounts of hazardous wastes. Because these landfills are pre-existing conditions, any environmental impacts from the landfills will not be attributable to the extension of the construction completion date for Unit 2. Furthermore, any impacts from the landfills will occur regardless of whether the construction completion date is extended, and an extension will not have any adverse effect on any impacts from the landfills. Therefore, the landfills in question have no relevance to the extension of the construction completion date for Unit 2.

In conclusion, there have been no unreviewed adverse environmental impacts associated with construction and none are anticipated.

III. Alternatives

A possible alternative to the proposed action would be for the Commission to deny the request. If this alternative were selected, TU Electric would not be able to complete construction of the facility, resulting in the denial of the benefits to be derived from the production of electric power. In addition, this alternative would not eliminate the environmental impacts of construction which have already been incurred. If construction were not completed on the CPSES Unit 2, while operation continued at CPSES Unit 1, the amount of site redress activities that could be undertaken to restore some of the area to its natural state would be minimal. The resulting environmental benefit, if any, would be significantly outweighed by the economic losses from denial of the use of a facility that is nearly complete. Therefore, this alternative is not reasonable.

IV. Alternative Use of Resources

This action does not involve the use of resources not previously considered in FES.

V. Conclusion and Basis for Finding of No Significant Impact

On the basis of the above, it is concluded there will be no significant environmental impact attributable to this requested action other than those already predicted and described in the FES-CP issued in June, 1974.