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**TU ELECTRIC**

March 16, 1992

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

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

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

- REF: 1) TU Electric letter TXX-92041 from William J. Cahill, Jr. to the NRC dated February 3, 1992
- 2) TU Electric letter TXX-6589 from W. G. Council to the NRC dated July 22, 1987
- 3) TU Electric letter TXX-6677 from W. G. Council to the NRC dated September 9, 1987

Gentlemen:

Pursuant to the telephone conversation between TU Electric and Mr. M. B. Fields, NRR, on February 24, 1992, TU Electric hereby provides a clarification of groundwater usage as previously described in Reference 1.

The tabulation of groundwater withdrawal rates described in the Environmental Impact Appraisal inadvertently excluded the amount of groundwater withdrawn from the NOSF well over the period of June 1, 1982 through July 13, 1987 (as previously described in Reference 2 and 3). In the course of evaluating this impact on the current request for extending the latest construction completion date until August 1, 1995, TU Electric has re-examined the previous estimate for groundwater withdrawal from the NOSF well.

After a careful re-evaluation of the NOSF well production data forms, the integrator (meter) reading for the NOSF well was determined to be approximately 4.17 million gallons as of December 31, 1986. This integrated groundwater pumpage reading for the NOSF well corresponds to the period of June 1982 through December 1986 and is equivalent to an average withdrawal rate of approximately 1.73 gallons per minute. TU Electric is confident that this pumpage rate reflects realistic construction usages during this time period since the NOSF building is the primary consumer of this groundwater.

*DOCK*

In addition, the groundwater pumpage for 1987 was determined to be approximately 4.52 million gallons. Thus, the total actual cumulative groundwater pumpage for the NOSF well from June 1982 through December 1987 was approximately 8.69 million gallons, which is significantly lower than the previous estimate of 17.04 million gallons for the period through July 13, 1987.

In summary, TU Electric does not believe that the NRC staff's previous appraisal is effected as it relates to the total groundwater to be withdrawn through August 1, 1995. First, from 1975 through February 1992, a total of approximately 564.56 million ( $5.65 \times 10^8$ ) gallons of groundwater have been withdrawn at CPSES. A summary of the actual total groundwater pumpage for CPSES from 1975 through February 1992 is presented in the attachment to this letter. Second, even assuming a maximum groundwater withdrawal of forty (40) gallons per minute from March 1, 1992 through August 1, 1995, for all groundwater sources, there would be approximately 71.88 million ( $0.72 \times 10^8$ ) gallons withdrawn. Totaling the above results in a conservative estimate of the total groundwater withdrawal for the period through August 1, 1995 of approximately  $6.37 \times 10^8$  gallons, which is less than the  $6.57 \times 10^8$  gallons originally evaluated and authorized by the NRC staff.

In conclusion, based on the above, the bases for the environmental impact appraisal would be unaffected by extending construction through August 1, 1995.

Sincerely,



William J. Cahill, Jr.

RSB/gj  
Attachments


c - Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (2)  
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 supplement to the 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 16th day of March, 1992.

  
Notary Public

SUMMARY OF GROUNDWATER PUMPAGE DURING  
CPSE\* CONSTRUCTION (GALLONS)

<u>YEAR</u>	<u>PUMPING WELL</u>	
	<u>NOS. 1 AND 2</u>	<u>NOSF</u>
1975	74,237,780 <sup>(2)</sup>	
1976	84,630,118 <sup>(2)</sup>	
1977	70,881,902 <sup>(2)</sup>	
1978	96,184,940 <sup>(2)</sup>	
1979	72,728,107 <sup>(3)</sup>	
1980	58,085,190 <sup>(4)</sup>	
1981	8,500,500 <sup>(4)</sup>	
1982	16,149,700 <sup>(4)</sup>	(1)
1983	613,200 <sup>(4)</sup>	
1984	1,758,500 <sup>(4)</sup>	
1985	6,873,900 <sup>(4)</sup>	
1986	5,709,200 <sup>(4)</sup>	4,174,200 <sup>(1)(4)</sup>
1987	4,925,300 <sup>(4)</sup>	4,521,600 <sup>(4)</sup>
1988	1,686,800 <sup>(4)</sup>	5,322,200 <sup>(4)</sup>
1989	8,352,500 <sup>(4)</sup>	4,956,600 <sup>(4)</sup>
1990	10,764,400 <sup>(4)</sup>	3,834,000 <sup>(4)</sup>
1991	14,404,300 <sup>(4)</sup>	2,674,700 <sup>(4)</sup>
1992 (Jan., Feb.)	2,595,200 <sup>(4)</sup>	488,100 <sup>(4)</sup>
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Total	539,081,537	25,971,400

Cumulative total of groundwater withdrawn from all groundwater sources through February, is 564, 564, 837 (5.65 x 10<sup>8</sup>) gallons

Notes:

- (1) The cumulative total groundwater withdrawal of 4,174,200 gallons was observed on the NOSF well meter as of December 31, 1986. This meter was installed on the NOSF well prior to initial operation with an initial reading of \*0\* gallons.
- (2) Groundwater usage data as identified in the Final Environment Statement.
- (3) Groundwater usage data taken from the Ground and Surface Water Use Report.
- (4) Groundwater usage data taken from the Annual Production Well Report.