



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION OF REQUEST FOR EXTENSION
OF THE LATEST CONSTRUCTION PERMIT COMPLETION DATE
TEXAS UTILITIES ELECTRIC COMPANY, ET AL.
COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 2
DOCKET NO. 50-446

1.0 INTRODUCTION

By letter dated February 3, 1992, as supplemented March 16, 1992, Texas Utilities Electric Company (TU Electric) applied for an extension of the construction completion date for Construction Permit CPPR-127 for Comanche Peak Steam Electric Station, Unit 2. TU Electric requested that the latest completion date be extended for up to three years, to August 1, 1995.

TU Electric previously requested an extension to the latest construction completion date in the 1987 - 1988 timeframe. This extension request was necessary to complete an intensive program of review and reinspection to provide evidence of the safe design and construction of Comanche Peak Steam Electric Station, Units 1 and 2. This program, along with the concentration of TU Electric resources on completing Unit 1 (necessitating a temporary suspension of Unit 2 construction), resulted in the Applicant's request to extend the latest construction completion date to August 1, 1992. As established by Commission Order on November 18, 1988, the Applicant's request was approved.

Due primarily to the unanticipated delay in completing construction and licensing efforts on Unit 1, the Applicant has requested an extension of the construction completion date for Unit 2. Pursuant to 10 CFR 50.55(b) the Applicant's request must show good cause for the extension and be for a reasonable time period. The staff has reviewed TU Electric's request based on the criterion specified in 10 CFR 50.55(b) and has provided the following evaluation.

2.0 EVALUATION

Good Cause

In their February 3, 1992, submittal TU Electric states that good cause exists to warrant the construction completion date extension request. TU Electric's previous request for an extension of the latest construction completion date was predicted based 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 the completion of Unit 1. Unit 1 was not licensed until February 1990. As a result of concentrating on Unit 1

construction completion, licensing, and initial power operation, TU Electric did not resume significant design activities for Unit 2 until June 1990, followed by the resumption of significant construction activity in January 1991. Thus, the period of suspension of Unit 2 work lasted much longer than originally estimated (close to three years versus the one year originally estimated). The longer period reflected the time needed to complete construction and startup of Unit 1.

In the staff's judgment, TU Electric has been assiduous in their efforts to detect and correct actual and potential violations of NRC regulations and complete the construction of the plant. Although their intensive program of review and reinspection lasted longer than predicted, it was essential to providing the requisite assurance of proper design and construction prior to Unit 1 licensing. Design and construction work on Unit 2 was appropriately deferred to allow for the knowledge gained from the reinspections and corrective action program to be applied to Unit 2.

The staff believes that neither the extent nor the complexity of the reinspections and reverifications could have been foreseen when the Applicant previously requested, and was granted, an extension of the latest construction completion date to August 1, 1992. The unanticipated prolonged suspension in the construction of Unit 2, for the purpose of reverifying design and completing Unit 1 construction and initial operation, warrants an extension of the construction permit for Unit 2. The staff, therefore, concludes that the Applicant has demonstrated good cause for the delay which warrants an extension of the construction permit for Unit 2.

Reasonableness of the Period of Time Requested

TU Electric has requested to extend the construction permit for three years, from August 1, 1992 to August 1, 1995. TU Electric states that this time period is needed to provide a period of continuous construction and testing, plus a contingency period for any unanticipated delays.

TU Electric currently estimates completion of construction in December 1992. The Applicant is maintaining relatively close to its planned construction and testing schedule. The three year extension request provides an adequate contingency period, and sets an acceptable end date where the construction permit would need to be reevaluated for environmental impacts.

The staff has evaluated TU Electric's request and agrees that the period of time requested for the extension of the latest construction completion date is reasonable.

3.0 ENVIRONMENTAL CONSIDERATION

The staff has also considered the environmental impacts of the construction permit, and has determined that the proposed action does not entail any construction activities significantly different from those that were considered in the Final Environmental Statement (FES) for Comanche Peak Units 1 and 2. The NRC staff requested and reviewed a supplemental submittal

dated March 16, 1992, which clarified groundwater usage. The staff verified that conservative estimates of groundwater use are within those limits originally evaluated and authorized by the NRC staff. The NRC staff concludes that the proposed action will not alter the conclusions reached in the FES. Pursuant to 10 CFR 51.32, the Commission has determined that extending the construction completion date will have no significant impact on the environment (57 FR 28885).

4.0 CONCLUSION

The staff, based on the above evaluation, concludes that pursuant to 10 CFR 50.55(b), the applicant has shown good cause for the delay and that the requested extension is for a reasonable period of time. Since the request is merely for more time to complete construction already authorized under Construction Permit No. CPPR-127 and does not seek authorization for activities not previously authorized, it does not involve a significant increase in the probability or consequences of an accident previously evaluated, or create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. Accordingly, the staff has concluded that the action does not involve a significant hazards consideration and no prior notice of issuance of the extension to the latest construction completion date is necessary in accordance with 10 CFR 50.92(a).

Based upon the above evaluation the staff has concluded that the issuance of an Order extending the latest completion date for construction of Comanche Peak Steam Electric Station, Unit 2 is reasonable and should be authorized. The latest completion date should be extended to August 1, 1995.

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Date: July 28, 1992