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Ref. # 10CFR50.55(b)

June 6, 1988

William G. Council  
Executive Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NO. 50-446  
AMENDMENT TO AND SUPPLEMENTAL INFORMATION REGARDING  
REQUEST FOR EXTENSION OF CONSTRUCTION PERMIT NO. CPPR-127

- REF: 1) TU Electric letter TXX-6322 from W. G. Council to the NRC dated April 29, 1987.
- 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.
- 4) TU Electric letter TXX-7004 from W. G. Council to the NRC dated December 3, 1987.
- 5) TU Electric letter TXX-88365 from W. G. Council to the NRC dated March 31, 1988.
- 6) TU Electric letter TXX-88373 from W. G. Council to the NRC dated April 14, 1988.

Gentlemen:

In Reference (1), TU Electric Company et al. ("Applicants") requested that the latest completion date under Construction Permit No. CPPR-127 for CPSES Unit 2, be extended to August 1, 1990. In References (2) through (4), additional information was provided with respect to groundwater withdrawal during the extended construction period. In References (5) and (6), Applicants informed the Commission that construction of Unit 2 was being temporarily delayed for a period of approximately one year beginning in April, 1988. This letter submits supplemental information relating to the Unit 2 schedule in further support of Reference (1), and changes the requested extension date.

Applicants have reviewed the projected completion schedule for Unit 2 in light of the one year temporary delay of construction. As noted in the SEC Form 10-K enclosed with Reference (5) (at page 14):

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Unit 2 is not expected to be ready for commercial operation until after 1991 peak season. The delay of Unit 2 was implemented to allow the Company to concentrate its resources on the completion of Unit 1, thereby reducing the duplication of effort that would be required to maintain the previous timing between the two units and strengthen the Company's ability to manage construction and start-up activities for both units more efficiently with fewer personnel. Additionally, such delay will allow time to make a more complete determination of any modifications that may be required for Unit 2 based upon the knowledge gained from the reinspection and corrective action program applied to Unit 1.

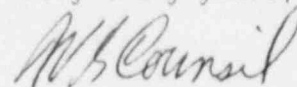
Thus, it has become apparent that additional time beyond August 1, 1990, is required to complete these processes, including a reasonable allowance for contingencies. Accordingly, Applicants hereby amend and supplement their filing of April 29, 1987 (Reference (1)) by requesting that the latest completion date in Construction Permit CPPR-127 for Comanche Peak Steam Electric Station, Unit 2, be extended until August 1, 1992. In light of the circumstances discussed in Reference (1), as hereby supplemented, good cause has been shown for such extension, and the request is "for a reasonable period of time" in accordance with 10CFR50.55(b).

We have also reviewed the proposed Environmental Impact Appraisal enclosed in Reference (1) and the supplemental information submitted in References (2) through (4) and have identified the following information that should be updated:

- (1) The second paragraph on page 2 of the proposed Appraisal discussed community impacts during the extension period. It reflected that at the time of the submittal (April 29, 1987) the peak workforce was approximately 7500. Since that time, the peak workforce has increased to approximately 8000, and is not expected to increase beyond that number. At the present time, that workforce is basically dedicated to the completion and preparation for operation of Unit 1, with a small percentage devoted to Unit 2 activities. The discussion in the proposed Appraisal indicated that the work activities associated with the Unit 2 Construction Permit extension would only require a projected peak workforce of 3500 personnel. It is now expected that when construction of Unit 1 is completed and Unit 2 construction is resumed, the workforce dedicated to Unit 2 may reach 4500. However, the peak workforce for Unit 1 and 2 combined will not exceed 8000. For the reasons explained in the proposed Appraisal, the maintenance of those workforce levels will not have any impacts on the local community significantly greater than those previously considered.

(2) In Reference (2), we calculated cumulative groundwater withdrawal through August 1, 1990, with the conservative assumption that the average withdrawal rate from July 1, 1987, to August 1, 1990, would be at the allowable limit of 40 gpm (as authorized by Amendment 6 to Construction Permits CPPR-126 and CPPR-127). In fact, the cumulative average groundwater withdrawal rate for 1987 was less than half of the allowable limit. This confirms the conservatism of our assumption. The total CPSES groundwater withdrawal for the period up to August 1, 1990, was estimated in Reference (2) at  $5.94 \times 10^8$  gallons. Using the same conservative assumption of withdrawal at the maximum allowable rate of 40 gpm, there would be approximately an additional 42 million ( $0.42 \times 10^8$ ) gallons withdrawn during the period from August 1, 1990, to August 1, 1992. Even under this conservative estimate, cumulative groundwater withdrawal at CPSES through August 1, 1992, would be approximately 21 million gallons less than previously evaluated and authorized. See Environmental Impact Appraisal Supporting Amendment No. 2 to CPPR-126 and CPPR-127, Comanche Peak Steam Electric Station, Units 1 and 2, Docket Nos. 50-445 and 50-446, November 16, 1979, at 1-2. Thus, continued construction through August 1, 1992, will not impose greater impacts on total groundwater withdrawal than those already evaluated.

Very truly yours,



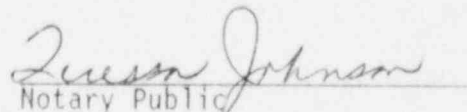
W. G. Council

RSB/grr

c - Ms. Melinda Malloy, OSP-NRC  
Mr. R. D. Martin, Region IV  
Resident Inspectors, CPSES (3)

STATE OF TEXAS :  
:  
COUNTY OF DALLAS :

There personally appeared before me W. G. Council, who being duly sworn did state that he is Executive Vice President, Nuclear Engineering and Operations, of TU Electric; that he is duly authorized to sign and file with the Nuclear Regulatory Commission this amendment to and supplemental information regarding the request for extension of Construction Permit CPPR-127 for Comanche Peak Steam Electric Station, Unit 2; that he is familiar with the content thereof; and that the matters of fact set forth therein are true and correct to the best of his knowledge, information, belief.



Notary Public

My commission expires: 3/12/90