

March 3, 1983

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
TEXAS UTILITIES GENERATING)	Docket Nos. 50-445 and
COMPANY, <u>et al.</u>)	50-446
)	
(Comanche Peak Steam Electric)	(Application for
Station, Units 1 and 2))	Operating Licenses)

APPLICANTS' RESPONSE TO BOARD
ORDER REQUESTING INFORMATION

I. BACKGROUND

In its Order Requesting Information, the Board directed the Applicants and NRC Staff to file written reports providing their current best projections of the completion date of Comanche Peak Unit 1. The Board directed that these parties "should focus on the bases of their respective projected dates of completion, and explain their reasons for the different results."

II. UNIT ONE FUEL LOAD

In 1981, when Applicants last revised the schedule for Comanche Peak construction and start-up, Applicants estimated based upon an assessment of construction progress that fuel could be loaded in Unit 1 in June 1983. As the Board noted in its Order, the Applicants and Staff held discussions (by telephone) on February 3, 1983 in an attempt to reconcile the different fuel

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load dates for Unit 1 projected by each (June 1983 by Applicants; December 1983 by Staff). These parties also met on February 28, 1983 in another attempt to reconcile the differences.

Applicants have the responsibility to be prepared to meet the earliest possible date for fuel loading consistent with public health and safety requirements. A careful reassessment has been made of the status of construction and the activities remaining to be completed. Based on this review, Applicants project that, if current schedules can be maintained, they will be prepared to load fuel for Comanche Peak Unit 1 in September 1983.

III. BASES FOR PROJECTED SCHEDULE

Applicants' bases for their September 1983, projected fuel load date are founded on a comprehensive analysis of the status of construction, milestones met and activities yet to be performed. We provide below for the Board a summary of this analysis.

Original design engineering for Comanche Peak Unit 1 is complete. Construction of Unit 1 was 94% complete as of February 18, 1983. System turnover has progressed at a rapid pace. Of the 320 systems and subsystems of Unit 1 and common facilities, 264 systems and subsystems had been turned over to the startup organization as of February 18, 1983. The remaining 56 systems and subsystems are scheduled to be completed and turned over to the startup organization by mid-year 1983.

With regard to engineering verification of construction, most activities are complete or are scheduled to be completed by June 1983. The self-evaluation and implementation of design and engineering criteria performed under the auspices of the Institute for Nuclear Power Operations (INPO) has been completed. It was provided to NRC Region IV in January 1983. The pipe support certification program (including efforts pursuant to I&E Bulletin 79-14) for large bore piping was 60% complete as of February 24, 1983, and for small bore piping 38% complete as of that date. The certification program for large bore pipe supports and small bore pipe supports will be completed by April 1983, and May 1983, respectively. Engineering design review of current field changes is expected to be completed by mid-year 1983. Applicants have dedicated substantial engineering resources to assure the schedules set forth above are met.

With regard to significant milestones for testing, several major programs have been conducted successfully over the last nine months. Cold hydrostatic tests on the reactor coolant system and secondary (main steam and feed-water) systems were completed in July 1982. The emergency diesel generators were tested successfully up to 110% of design load and performed satisfactorily during 100% load rejection tests, all in October 1982. The emergency core cooling system was tested successfully in December 1982. The Unit 1 containment building structural integrity test and integrated leak rate test were successfully

completed in January 1983. The hot functional testing program for the entire Unit 1 plant system was begun on February 24, 1983.

With regard to the development of procedures for acceptance and preoperational testing for Unit 1 and common facilities, 164 out of 187 procedures had been approved by the Comanche Peak joint test group and released for implementation as of February 18, 1983. The remaining 23 procedures are scheduled to be approved and released for implementation by mid-year 1983. Of the 187 acceptance and preoperational tests that must be completed, 100 have been started, with 67 physically completed, as of February 18, 1983. Of the 67 that are physically completed, 34 have completed documentation review and data packages have been reviewed and approved. This testing activity is scheduled to be completed by mid-year 1983.

With regard to operator training and staffing, the levels already attained exceed those required for full power operation of Unit 1. The control room for Unit 1 has been fully staffed 24 hours per day for several months. The permanent plant security force is staffed to a sufficient level to meet current security requirements and the staffing will increase to meet the numbers required for fuel loading and plant operations.

With regard to the emergency prompt notification system, the entire 40-siren system is installed and has been individually tested. With regard to special nuclear material, all fuel for

Unit 1 is scheduled to be on site and available for loading of the first core by September 1983. The SNM license was received from the NRC in February 1983.

IV. DIFFERENCES NOT SIGNIFICANT

Applicants believe that there are not any significant differences between their evaluation of progress and work to be completed and that made by the Staff. Any difference in estimated fuel load can be attributed to the respective opinions as to whether Applicants can maintain their current schedule.

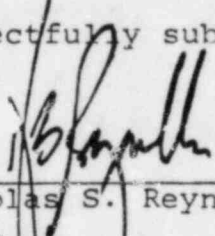
As previously noted, Applicants do have an obligation to be prepared to load fuel at the earliest date attainable. We believe that the September fuel load is attainable and are committed to the dedication of resources necessary to meet that date. However, Applicants fully recognize the complexity of the construction and preoperational schedule. Thus, in basing our estimate on successful completion of the present schedule, we realize, as does the Staff, that such schedule is subject to change due to unforeseen events or circumstances beyond our control.

V. CONCLUSION

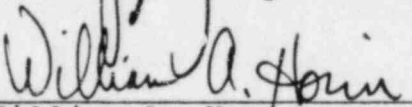
Even though Applicants have revised their projected fuel load for Comanche Peak Unit 1 to September, 1983 (a change of three months), the risk of not completing the licensing process prior to the completion of the facility has not been eliminated. In this regard, the Appeal Board recently noted that there is "a manifest need to avoid unnecessary delay in the

completion of the [Comanche Peak] proceeding." ALAB-716 (March 1, 1983), slip op., at 6. We trust that the Board will continue its concerted efforts to conclude this proceeding fairly and expeditiously.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Response to Board Order Requesting Information," in the above-captioned matter were served upon the following persons by hand delivery (*) or by deposit in the United States mail, first class postage prepaid, this 3rd day of March 1983:

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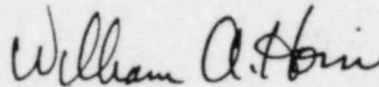
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