

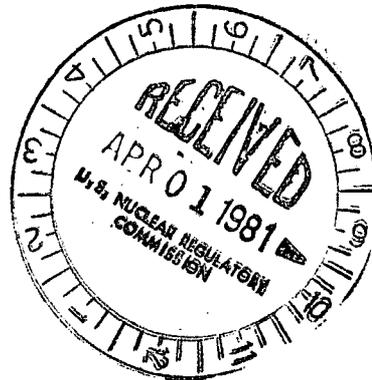
Consolidated Edison Company of New York, Inc.  
4 Irving Place, New York, N Y 10003  
Telephone (212) 460-2533

Letter No. 81-40

March 3, 1981

Re: Indian Point Unit No. 2  
Docket No. 50-247

Mr. Boyce H. Grier, Director  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406



Dear Mr. Grier:

This letter is an update of our September 15, 1980 response to your July 31, 1980 letter which forwarded I.E. Bulletin No. 80-20. This Bulletin requested information regarding the use of Westinghouse Type W-2 Spring Return to Neutral Switches.

Our earlier response to Question 2 of the Bulletin identified an interim modification consisting of temporary panels with indicating lights for each of the switches to provide direct contact monitoring. Our earlier response to Question 3 of the Bulletin proposed a long term modification which would be installed during the current refueling/maintenance outage. The primary difference, between the interim and long term modifications, is the location of the indicating lights. For the interim modification the lights are located in back of the control board; for the long term modification, they are on the front of the control board.

We have re-evaluated our response to Question 3 of Bulletin 80-20, and, for the reasons discussed below, have concluded that the interim modification, presently installed, is a more acceptable solution and provides advantages over the long term modification that was originally proposed.

From a human engineering point of view, the long term modification would require the new lights to be installed in many locations on the front of the board adjacent to their associated W-2 switches. This would make it necessary for the operator to check all these locations during verification checks. In contrast, the interim modification grouped all the new indicating lights by category. The operator can easily identify the condition of all the contacts at any time.

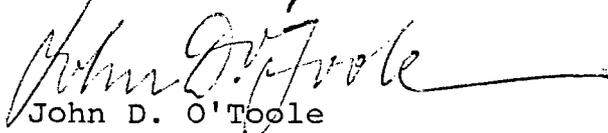
Further, additional instrumentation is to be added to the front of the control boards during the current outage. Since space on the front of the boards is already at a premium, human engineering considerations dictate that further additions be very carefully evaluated.

Finally, we have not experienced at Indian Point 2 the switch problem identified in Bulletin 80-20 either before, or since the installation of the indicating lights. It is also noted that the W-2 switches identified in the Bulletin are operated infrequently.

Based on the above, we conclude that the indicating light panels already installed on the back of the control board fully satisfy the requirements of Bulletin 80-20, and we hereby withdraw our response to Question 3 of the Bulletin. With the administrative procedures in place to check the indicating lights once per shift and each time any W-2 switch is operated, we conclude that it is not necessary or desirable to relocate the indicating lights to the front of the control board.

Should you or your staff have any questions, please contact us.

Very truly yours,

  
John D. O'Toole  
Vice President

cc: Director, Division of Reactor Operations Inspection  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
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