John D. O'Toole
Vice President

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

July 5, 1984

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

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Eisenhut:

The purpose of this letter is to request a schedule exemption for the installation and testing of the battery-backed emergency lighting units being installed as part of the Indian Point Unit 2 (IP-2) fire protection improvements to satisfy Appendix R to 10 CFR 50. In accordance with 10 CFR 50.12 Con Edison requests a schedule exemption of up to three (3) months after startup from the current plant refueling outage to allow sufficient time to complete the installation of the additional battery-backed emergency lighting units, and for performing the field test/walkdown to verify their adequacy. In the interim, until the installation and field test/walkdown are complete, the existing emergency lighting units plus hand-held lighting units available on site will be used, if required. We have determined that it is feasible to perform the alternate shutdown using this equipment. The basis for this request is provided below.

On July 13, 1983 we filed a supplemental report containing the results of additional evaluations of the fire protection features at IP-2. At that time, the need for additional battery-backed emergency lighting units was not fully specified although we anticipated completion of any required installation during the 1984 refueling outage because of a potential need for removing required power supplies from service. The lighting units were ordered early to have them available for installation.

Since then we fully developed the design package and have engineered the design so that its implementation does not require a plant outage. We have concluded that post-outage installation is preferable because it results in major cost savings, not achievable during a refueling outage. For this reason, we plan to implement this design change, including the field test/walkdown, within three (3) months after startup from the current refueling outage. Under the schedule requirements of 10 CFR

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50.48(c)(4)the installation of the additonal lighting units to complement the alternate safe shutdown system (ASSS) would have to be completed by September 30, 1984, which is 6 months after issuance of the supplemental Safety Evaluation Report (SER) for the ASSS. The projected completion will now extend beyond September 30, 1984, necessitating this request for schedular exemption. In the unlikely event that the field test/walkdown identifies the need for further lighting changes, we will at that time assess the need for an additional schedule exemption.

If there are any questions regarding this request, don't hesitate to call me.

Very truly yours,

John D. O'Toole
Vice President

cc: Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511