

John D. O'Toole
Vice President

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July 26, 1985

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

Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Thompson:

The purpose of this letter is to withdraw a portion of our exemption request related to emergency lighting needed to satisfy 10 CFR 50, Appendix R. On July 8, 1985 we discussed this matter with members of your staff.

On July 13, 1983 we requested an exemption from the emergency lighting requirements of Section III.J of 10 CFR 50, Appendix R. This exemption request was further supported by information submitted on September 9, 1983 and May 23, 1985. A portion of the request applies to the Indian Point Unit 1 (IP-1) Superheater Building, where certain power distribution components for the Indian Point Unit 2 (IP-2) Alternate Safe Shutdown System (ASSS) are located. This portion of the exemption request would allow the use of IP-1 emergency lighting in lieu of fixed 8-hour battery pack lighting for performing ASSS operations.

Recently, we updated our routine surveillance procedure for Appendix R emergency lighting to cover the installations made in IP-2 as noted in our January 31, 1985 letter and at that time extended the surveillance coverage to the IP-1 emergency lighting which formed the basis of our exemption request. In performing surveillance of the IP-1 emergency lighting, we found the system to be inoperable. A review conducted by plant and engineering personnel revealed that the IP-1 emergency lighting system would require substantial modification to make it operable and to provide adequate coverage of the ASSS locations in the IP-1 Superheater Building. We have therefore concluded that it would be cost-effective and beneficial to routine surveillance to install new fixed 8-hour battery pack emergency lights in the IP-1 Superheater Building for

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operation of ASSS equipment, and access/egress routes thereto, in accordance with Section III.J of Appendix R. Therefore, the exemption request that would allow the use of installed IP-1 emergency lighting is no longer necessary. Accordingly, we withdraw that portion of the exemption request related to IP-1 emergency lighting that was submitted on July 13, 1983.

We have initiated the design work necessary to implement the new emergency lighting in the IP-1 Superheater Building. Development of the requisite modification package, including review and approval, plus procurement and installation require that implementation of the new IP-1 emergency lighting be rescheduled for 6 mos. after NRC issuance of the Safety Evaluation Report (SER) covering our emergency lighting installations and exemptions. This installation schedule is consistent with 10 CFR 50.48(c)(4) and (c)(5). Testing will be done within 2 months after the installation is complete.

If you have any questions, do not hesitate to call us.

Very truly yours,



John D. O'Toole
Vice President

cc: Senior Resident Inspector
U. S. Nuclear Regulatory Commission
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