



**Commonwealth Edison**

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*Dmb*

August 29, 1984

Mr. James G. Keppler  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: Byron Station Units 1 and 2  
Braidwood Station Units 1 and 2  
Intermittent Contact Operation of  
Type W-2 Switch  
IE Bulletin 80-20 and 50.55(e) 80-01  
NRC Docket Nos. 50-454/455/456/457

References (a): April 10, 1981 letter from T. R. Tramm  
to J. G. Keppler

(b): April 30, 1981 letter from T. R. Tramm  
to J. G. Keppler

Dear Mr. Keppler:

This is to clarify information provided in reference (b) regarding the resolution of the W-2 switch 50.55(e) deficiency at Byron and Braidwood. Reference (b) indicated that all safety related W-2 switches would be replaced with switches manufactured to revised assembly and electroplating procedures. A further limitation on this statement should have been included. The limitation should have stipulated that all safety related W-2 switches would be replaced unless justification could be provided to demonstrate that replacement of the control switches was not required in response to IE Bulletin 80-20. We believe that the exclusion of switches from the replacement program can be justified by any of the following conditions:

1. The switch is of the maintained contact type, not the "spring return of neutral" type described in IE Bulletin Number 80-20.
2. A failure of the "neutral" position contact will not affect the operation of safety-related equipment because the contact is not used in a control circuit.
3. The switch does not perform a safety-related control function (i.e. ammeter switch, voltmeter switch, etc.).

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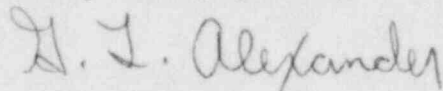
4. The switch is used for testing purposes only (i.e. not normal control).
5. The switch is located on a switchgear cubicle and is functional only when the breaker is in the test position.

Attached is a three page list of safety-related switches which were not replaced. The list contains the switch designation, justification for exclusion, and switch location.

To the best of my knowledge and belief the statements contained above true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees, consultants, and contractors. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address any questions regarding this matter to this office.

Very truly yours,



G. L. Alexander  
Nuclear Licensing Administrator

Attachment

cc: US NRC, Document Control Desk  
Washington, DC 20555

Director of Inspection and Enforcement  
Resident Inspector - By/Bw

9124N

W2 Switches Excluded from  
Replacement Program

Commonwealth Edison Company  
Byron/Braidwood Station Units 1 and 2

<u>Switch Designation</u>	<u>Justification</u>	<u>Location</u>
43AC1	1, 2	Diesel Gen. Panel 1(2)PL07J
43AC2	1, 2	Diesel Gen. Panel 1(2)PL07J
43QH	1, 2	Diesel Gen. Panel 1(2)PL07J
43QPP	1, 2	Diesel Gen. Panel 1(2)PL07J
43JWH	1, 2	Diesel Gen. Panel 1(2)PL07J
43JWCP	1, 2	Diesel Gen. Panel 1(2)PL07J
43AD1	1, 2	Diesel Gen. Panel 1(2)PL08J
43AD2	1, 2	Diesel Gen. Panel 1(2)PL08J
43QH	1, 2	Diesel Gen. Panel 1(2)PL08J
43QPP	1, 2	Diesel Gen. Panel 1(2)PL08J
43JWH	1, 2	Diesel Gen. Panel 1(2)PL08J
43JWCP	1, 2	Diesel Gen. Panel 1(2)PL08J
43CM	1	Diesel Gen. Panel 1(2)PL07J
43RM	1	Diesel Gen. Panel 1(2)PL07J
43UP	1	Diesel Gen. Panel 1(2)PL07J
43CF	1	Diesel Gen. Panel 1(2)PL07J
43SC	2	Diesel Gen. Panel 1(2)PL07J
43VC	2	Diesel Gen. Panel 1(2)PL07J
43A	1	Diesel Gen. Panel 1(2)PL07J
43V	1, 3	Diesel Gen. Panel 1(2)PL07J
43CM	1	Diesel Gen. Panel 1(2)PL08J
43RM	1	Diesel Gen. Panel 1(2)PL08J
43UP	1	Diesel Gen. Panel 1(2)PL08J
43CH	1	Diesel Gen. Panel 1(2)PL08J
43CF	1	Diesel Gen. Panel 1(2)PL08J
43SC	2	Diesel Gen. Panel 1(2)PL08J
43VC	2	Diesel Gen. Panel 1(2)PL08J
43A	1	Diesel Gen. Panel 1(2)PL08J
43V	1, 3	Diesel Gen. Panel 1(2)PL08J
IHS-D0003(43F01)	1, 2	Diesel Gen. Panel 1(2)PL07J
IHS-D0004(43F01)	1, 2	Diesel Gen. Panel 1(2)PL08J
IHS-D0005(43F02)	1, 2	Diesel Gen. Panel 1(2)PL07J
IHS-D0006(43F02)	1, 2	Diesel Gen. Panel 1(2)PL08J
IHS-D0039(43F07)	1	Diesel Gen. Panel 1(2)PL07J
IHS-D0040(43F07)	1	Diesel Gen. Panel 1(2)PL08J
CS1A	1, 4	Seg. & Act. Cabinet 1(2) PAI13J
CS2A	1, 4	Seg. & Act. Cabinet 1(2) PAI13J
CS1B	1, 4	Seg. & Act. Cabinet 1(2) PAI14J
CS2B	1, 4	Seg. & Act. Cabinet 1(2) PAI14J
43SW	1	Diesel Gen. Panel 1(2) PL07J
43SW	1	Diesel Gen. Panel 1(2) PL08J
W2 Volt Switch	1, 3	125V DC Dist. Center 1(2)DC05E
W2 Volt Switch	1, 3	125V DC Dist. Center 1(2)DC06E

Commonwealth Edison Company  
Byron/Braidwood Station Units 1 and 2

<u>Switch Designation</u>	<u>Justification</u>	<u>Location</u>
LSC	2, 5	Switchgear 1(2)AP05EA
LSC	2, 5	Switchgear 1(2)AP05EB
LSC	2, 5	Switchgear 1(2)AP05EC
LSC	2, 5	Switchgear 1(2)AP05ED
LSC	2, 5	Switchgear 1(2)AP05EF
LSC	2, 5	Switchgear 1(2)AP05EG
LSC	2, 5	Switchgear 1(2)AP05EH
LSC	2, 5	Switchgear 1(2)AP05EJ
LSC	2, 5	Switchgear 1(2)AP05EK
LSC	2, 5	Switchgear 1(2)AP05EL
LSC	2, 5	Switchgear 1(2)AP05EM
LSC	2, 5	Switchgear 1(2)AP05EN
LSC	2, 5	Switchgear 1(2)AP05EP
LSC	2, 5	Switchgear 1(2)AP05ER
LSC	2, 5	Switchgear 1(2)AP05ES
LSC	2, 5	Switchgear 1(2)AP05ET
LSC	2, 5	Switchgear 1(2)AP05EU
LSC	2, 5	Switchgear 1(2)AP05EV
LSC	2, 5	Switchgear 1(2)AP06EA
LSC	2, 5	Switchgear 1(2)AP06EB
LSC	2, 5	Switchgear 1(2)AP06EC
LSC	2, 5	Switchgear 1(2)AP06ED
LSC	2, 5	Switchgear 1(2)AP06EF
LSC	2, 5	Switchgear 1(2)AP06EG
LSC	2, 5	Switchgear 1(2)AP06EH
LSC	2, 5	Switchgear 1(2)AP06EJ
LSC	2, 5	Switchgear 1(2)AP06EK
LSC	2, 5	Switchgear 1(2)AP06EL
LSC	2, 5	Switchgear 1(2)AP06EM
LSC	2, 5	Switchgear 1(2)AP06EN
LSC	2, 5	Switchgear 1(2)AP06EP
LSC	2, 5	Switchgear 1(2)AP06EQ
LSC	2, 5	Switchgear 1(2)AP06ES
LSC	2, 5	Switchgear 1(2)AP06ET
LSC	2, 5	Switchgear 1(2)AP06EU
L43	1, 5	Switchgear 1(2)AP05EA
L43	1, 5	Switchgear 1(2)AP05EB
L43	1, 5	Switchgear 1(2)AP05EC
L43	1, 5	Switchgear 1(2)AP05ED
L43	1, 5	Switchgear 1(2)AP05EF
L43	1, 5	Switchgear 1(2)AP05EG
L43	1, 5	Switchgear 1(2)AP05EH

Commonwealth Edison Company  
Byron/Braidwood Station Units 1 and 2

<u>Switch Designation</u>	<u>Justification</u>	<u>Location</u>
L43	1, 5	Switchgear 1(2)AP05EJ
L43	1, 5	Switchgear 1(2)AP05EK
L43	1, 5	Switchgear 1(2)AP05EL
L43	1, 5	Switchgear 1(2)AP05EM
L43	1, 5	Switchgear 1(2)AP05EN
L43	1, 5	Switchgear 1(2)AP05EP
L43	1, 5	Switchgear 1(2)AP05ER
L43	1, 5	Switchgear 1(2)AP05ES
L43	1, 5	Switchgear 1(2)AP05ET
L43	1, 5	Switchgear 1(2)AP05EU
L43	1, 5	Switchgear 1(2)AP05EV
L43	1, 5	Switchgear 1(2)AP06EA
L43	1, 5	Switchgear 1(2)AP06EB
L43	1, 5	Switchgear 1(2)AP06EC
L43	1, 5	Switchgear 1(2)AP06ED
L43	1, 5	Switchgear 1(2)AP06EF
L43	1, 5	Switchgear 1(2)AP06EG
L43	1, 5	Switchgear 1(2)AP06EH
L43	1, 5	Switchgear 1(2)AP06EJ
L43	1, 5	Switchgear 1(2)AP06EK
L43	1, 5	Switchgear 1(2)AP06EL
L43	1, 5	Switchgear 1(2)AP06EM
L43	1, 5	Switchgear 1(2)AP06EN
L43	1, 5	Switchgear 1(2)AP06EP
L43	1, 5	Switchgear 1(2)AP06EQ
L43	1, 5	Switchgear 1(2)AP06ES
L43	1, 5	Switchgear 1(2)AP06ET
L43	1, 5	Switchgear 1(2)AP06EU