

## TECHNICAL SPECIFICATIONS TASK FORCE A JOINT OWNERS GROUP ACTIVITY

August 31, 2007 TSTF-07-26 PROJ0753

U. S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555-0001

SUBJECT: TSTF-500, Revision 0, "DC Electrical Rewrite - Update to TSTF-360"

Dear Sir or Madam:

Enclosed for NRC review is Revision 0 of TSTF-500, "DC Electrical Rewrite - Update to TSTF-360."

TSTF-360-A, "DC Electrical Rewrite," was approved by the NRC in December 2000 and was incorporated in Revision 2 of the Improved Standard Technical Specifications (ISTS) (NUREG-1430, -1431, -1432, -1433, and -1434). However, NRC reviewers have questioned some of the provisions approved in TSTF-360-A, resulting in unclear guidance from the NRC and complicating the plant-specific adoption of the TSTF Traveler. The NRC provided a letter on April 11, 2006 which described their concerns with TSTF-360-A. The TSTF formed a working group of industry experts to address the NRC's concerns. The working group developed responses and met with the NRC on July 12, 2006. At the recommendation of the NRC, the TSTF utilized the working group's responses and the NRC's December 19, 2006 approval of a LaSalle license amendment request to adopt TSTF-360-A (Accession number ML063200215) as the basis for developing this Traveler. The purpose of TSTF-500 is to supersede TSTF-360-A in order to correct the ISTS NUREGs and to provide clear guidance to licensees wishing to pursue a license amendment on this issue.

The TSTF would welcome the opportunity to meet with the NRC to discuss this Traveler and to describe the changes proposed to the NRC's ISTS to address the NRC's concerns.

We request that the Traveler be made available under the Consolidated Line Item Improvement Process (CLIIP). We recognize that the NRC's review of plant-specific amendments based on TSTF-500 may require technical review by the NRC and may not be processed as efficiently as most license amendments requested under the CLIIP. However, we believe the development of a draft Safety Evaluation, model amendment request, and model No Significant Hazards Consideration Determination will be very beneficial to licensees and the NRC.

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We request that NRC review of TSTF-500 be granted a fee waiver pursuant to the provisions of 10 CFR 170.11. This Traveler meets the exemption requirement in 10 CFR 170.11(a)(1)(iii), in that it is "a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts." In this case, the generic regulatory improvement is the correction of the NRC's Standard Technical Specifications in NUREGs 1430 through 1434 and the incorporation into the NRC's Standard Technical Specifications the improvements and clarifications requested by the NRC in their April 11, 2006 letter.

Should you have any questions, please do not hesitate to contact us.

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Enclosure

cc: Tim Kobetz, Technical Specifications Branch, NRC Ross Telson, Technical Specifications Branch, NRC Matthew Hamm, Technical Specifications Branch, NRC

# Technical Specification Task Force Improved Standard Technical Specifications Change Traveler

DC Electrical Rewrite - Update to TSTF-360

NUREGs Affected: 🗸 1430 🗸 1431 🗸 1432 🗸 1433 🗸 1434

Classification 1) Technical Change Recommended for CLIIP?: Yes

Correction or Improvement: Improvement NRC Fee Status: Exemption Requested

Benefit: Allows Less Stringent Testing

Industry Contact: Bert Yates, (314) 554-3573, gyates@ameren.com

See attached.

## **Revision History**

OG Revision 0 Revision Status: Active

Revision Proposed by: PWROG

Revision Description: Original Issue

**Owners Group Review Information** 

Date Originated by OG: 01-Aug-07

**Owners Group Comments** 

(No Comments)

Owners Group Resolution: Approved Date: 17-Aug-07

**TSTF Review Information** 

TSTF Received Date: 20-Aug-07 Date Distributed for Review 30-Aug-07

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments: (No Comments)

TSTF Resolution: Approved Date: 30-Aug-07

**NRC Review Information** 

NRC Received Date: 31-Aug-07

## **Affected Technical Specifications**

Bkgnd 3.8.4 Bases DC Sources - Operating

LCO 3.8.4 Bases	DC Sources - Operating	
Ref. 3.8.4 Bases	DC Sources - Operating	
Action 3.8.4.A	DC Sources - Operating	
Action 3.8.4.A Bases	DC Sources - Operating	
Action 3.8.4.B	DC Sources - Operating	
Action 3.8.4.B Bases	DC Sources - Operating	
Action 3.8.4.C Bases	DC Sources - Operating	
SR 3.8.4.1 Bases	DC Sources - Operating	
SR 3.8.4.2 Bases	DC Sources - Operating	
SR 3.8.4.3 Bases	DC Sources - Operating	
LCO 3.8.5 Bases	DC Sources - Shutdown	
Action 3.8.5.A	DC Sources - Shutdown	
Action 3.8.5.A Bases	DC Sources - Shutdown	
Action 3.8.5.B Bases	DC Sources - Shutdown	
Bkgnd 3.8.6 Bases	Battery Parameters	
S/A 3.8.6 Bases	Battery Parameters	
LCO 3.8.6	Battery Parameters	
Ref. 3.8.6 Bases	Battery Parameters	
Action 3.8.6.A	Battery Parameters	
Action 3.8.6.A Bases	Battery Parameters	
Action 3.8.6.B	Battery Parameters	
Action 3.8.6.B Bases	Battery Parameters	
Action 3.8.6.C	Battery Parameters	
Action 3.8.6.C Bases	Battery Parameters	
Action 3.8.6.D	Battery Parameters	
Action 3.8.6.D Bases	Battery Parameters	

Battery Parameters		
Battery Parameters		
.17 Battery Monitoring and Maintenance Program NUREG(s)- 1430 1431 14		
Battery Monitoring and Maintenance Program	NUREG(s)- 1433 1434 Only	
	Battery Parameters  Battery Monitoring and Maintenance Program	

## 1.0 Description

This Traveler updates and replaces TSTF-360-A, Revision 1, "DC Electrical Rewrite." The update reflects the current NRC position on the proposed changes and approval of recent plant-specific amendments to adopt TSTF-360. This update also provides sufficient information for the NRC to write a model Safety Evaluation and model application and to offer adoption of these changes under the Consolidated Line Item Improvement Process (CLIIP).

The proposed changes request new actions for an inoperable battery charger and alternate battery charger testing criteria for Limiting Condition for Operation (LCO) 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown." The proposed changes also include the relocation of a number of Surveillance Requirements (SRs) in TS 3.8.4 that perform preventive maintenance on the safety related batteries to a licensee-controlled program . It is proposed that LCO 3.8.6, "Battery Parameters," be modified by relocating Table 3.8.6-1, "Battery Cell Parameter Requirements," to a licensee-controlled program, and that specific actions with associated Completion Times for out-of-limits conditions for battery cell voltage, electrolyte level, and electrolyte temperature be added to TS 3.8.6. In addition, specific SRs are being proposed for verification of these parameters.

A new program is being proposed for Section 5.5 of the Administrative Controls for the maintenance and monitoring of station batteries. The items proposed to be relocated will be contained within this new program, titled the "Battery Monitoring and Maintenance Program."

The proposed Traveler provides new Actions for an inoperable battery charger and alternate battery charger testing criteria. The longer Completion Time for an inoperable battery charger will allow additional time for maintenance and testing. In addition, a number of Surveillance Requirements are relocated to licensee control. Monitoring of battery cell parameter requirements and performance of battery maintenance activities are relocated to a licensee-controlled program. The Technical Specification requirements are revised from requirements on battery cells to requirements on the battery. This focuses the requirements on the assumed safety function of the battery.

#### 2.0 Proposed Change

The proposed change revises the following Specifications:

Specification 3.8.4, "DC Sources Operating," to add Conditions for inoperable battery chargers and inoperable batteries. Specification 3.8.4 is also revised to relocate the Surveillances on battery corrosion, connection resistance, visual inspection, terminal connection, and discharge tests to an administrative program or to other specifications.

Specification 3.8.5, "DC Sources - Shutdown," to add Conditions for inoperable battery chargers and inoperable batteries. The list of TS 3.8.4 Surveillances that must be met is also revised to be consistent with the changes to TS 3.8.4.

Specification 3.8.6, "Battery Cell Parameters," is renamed "Battery Parameters." Table 3.8.6-1 is deleted and the existing Conditions and Surveillances are replaced.

A new Administrative Controls program, titled "Battery Monitoring and Maintenance Program," is added to Section 5.5, "Programs and Manuals."

### 3.0 Background

TSTF-360, "DC Electrical Rewrite," was approved by the NRC in December 2000 and incorporated in Revision 1 of the ISTS NUREGs. It was adopted by some plants as part of ITS conversion and under some separate license amendments, however success with adoption of TSTF-360 has been difficult because the NRC Electrical Branch did not agree with some of the provisions. At the TSTF's request, NRC provided a letter describing their concerns with TSTF-360 on April 11, 2006. The TSTF formed a Working Group including the sites that currently had TSTF-360 based LARs under review by the NRC and with industry experts. The Working Group developed responses and was able to address the NRC's concerns.

At the recommendation of the NRC, the TSTF utilized the NRC's December 19, 2006 approval of a LaSalle amendment request to adopt TSTF-360 (Accession number ML063200215) as the basis for developing this Traveler.

TSTF-360-A was incorporated into Revision 2 of the ISTS NUREGs. Attachment A shows the changes to the current version of the ISTS NUREGS (Revision 3.1) to incorporate the differences between TSTF-360-A and TSTF-500. Attachment B shows the changes to Revision 1 of the ISTS NUREGs to incorporate TSTF-500. For plants that have not adopted TSTF-360-A, the changes in Attachment B should be used as a model for the plant-specific TS changes.

#### 4.0 Technical Analysis

The standard Technical Specifications for pressurized water reactors (NUREG-1430, --1431, and -1432) uses the term "train" to refer to the independent and redundant subsystems that make up the DC electrical power system. The boiling water reactor standard Technical Specifications (NUREG-1433 and NUREG-1434) use the term "division." For the purpose of this Traveler, the term "subsystem" is used but the discussion is equally applicable to trains or divisions.

## 4.1 DC Electrical Power System Design

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment and preferred AC vital bus power (via inverters). As required by 10 CFR 50, Appendix A, GDC 17, the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure.

The DC electrical power system typically consists of two independent and redundant safety related Class 1E DC electrical power subsystems. Each subsystem consists of the batteries, the associated battery charger(s) for each battery, and all the associated control equipment and interconnecting cabling.

During normal operation, the DC load is powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC load is automatically powered from the station batteries.

Each battery is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystem to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. There is no sharing of dedicated components between redundant Class 1E subsystems, such as batteries, battery chargers, or distribution panels.

Each battery has adequate storage capacity to meet the duty cycle(s) assumed in the accident analyses. The battery is normally designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

Each DC electrical power subsystem battery charger has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger also has sufficient excess capacity to restore the battery from the design minimum charge to its fully charged state while supplying normal steady state loads.

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint.

## 4.2 Differences Between TSTF-360-A and TSTF-500

TSTF-360-A was based on IEEE-450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications." The NRC has not reviewed or endorsed IEEE-450-1995. Therefore, the changes proposed in TSTF-500 are justified without reliance on IEEE-450-1995. Note that the NRC has endorsed IEEE-450-2002 in Regulatory Guide 1.129.

TS 3.8.4, Required Action A.3, and TS 3.8.5, Required Action A.3, contains a 72 hour Completion Time vice the 7 day Completion Time in TSTF-360-A. Licensees wishing to adopt a Completion Time for Required Action A.3 longer than 72 hours will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis." Alternatively, the 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

TSTF-360-A applied a Reviewer's Note to TS 3.8.6 which stated that licensees must adopt a Battery Monitoring and Maintenance Program based on IEEE-450-1995. That Reviewer's Note is deleted in TSTF-500 because it is no longer necessary. Reliance on IEEE-450-1995 has been eliminated in TSTF-500 and adoption of the Program will be part of the CLIIP item to adopt TSTF-500.

The Battery Monitoring and Maintenance Program is revised to eliminate reference to IEEE-450-1995, to require actions to equalize and test battery cells when the electrolyte level drops below the top of plates instead of when the electrolyte level drops below the minimum established design limit, to require actions to verify the remaining cells are > [2.07] V when a cell or cells have been found to be <[2.13] V.

TSTF-360-A contained two documents: "Battery Primer for Nuclear Power Plants," and "Assessment of Lead-Acid Battery State of Charge by Monitoring Float Current," which are also included in this Traveler as Enclosures 1 and 2. These documents provided justification for using float current instead of specific gravity as a method of monitoring the state-of-charge for the batteries and establishing a return to service limit. In order use float current, licensees are required to provide letters from the manufacturers of the batteries in use at their station supporting the use of float current monitoring instead of specific gravity monitoring and to provide plant/battery specific bases for the [2] amp return to service limit. One method of selecting the return to service limit that has been accepted by the NRC is reserving [5%] of the available design margin above that required to perform the intended design function. See the "Verifications and Regulatory Commitments" section, below.

4.3 Proposed Changes to Specification 3.8.4, "DC Sources - Operating"

## 4.3.1 Proposed Changes to Specification 3.8.4, "DC Sources - Operating" Actions

TS 3.8.4 contains a Condition for one DC electrical train inoperable. The proposed change adds two additional Conditions, which are exceptions to the existing Condition. The proposed change to the TS 3.8.4 Actions addresses the condition in which one or two required battery chargers on one train are inoperable and effectively increases the Completion Time for an inoperable battery charger from the existing 2 hours to

[72] hours, provided that battery terminal voltage is restored to greater than or equal to the minimum established float voltage within 2 hours, and battery float current is verified to be is less than or equal to [2] amps once per [12] hours.

The first Condition (new Condition A) applies when one [or two] battery charger[s] on one train are inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). There are three Required Actions. The Required Actions provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to Operable status in a reasonable time period. The first Required Action states that the battery terminal voltage must be restored to greater than or equal to the minimum established float voltage within 2 hours. The second Required Action states that the battery float current must be verified to be  $\leq$  [2] amps once per [12] hours. As stated in a Reviewer's Note in the Bases, a plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3). The third Required Action states that the battery charger[s] must be restored to Operable status. The third Completion Time is [72] hours.

New Required Action A.1 would provide assurance that a battery discharge is terminated by requiring that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. The battery charger, in addition to maintaining battery operability, provides DC control power to AC circuit breakers and thus supports the recovery of AC power following events such as loss of offsite power or station blackout (SBO). The 2 hour Completion Time provides an allowance for returning an inoperable charger to Operable status or for reestablishing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. This provides assurance that the battery will be restored to its fully charged condition from any discharge that might have occurred due to the battery charger being inoperable. At the end of the 2 hours, a terminal voltage of at least the minimum established float voltage provides indication that the battery is on the exponential charging current portion of its recharging cycle.

New Required Action A.2 would require that once per [12] hours, the battery float current be verified to be less than or equal to [2] amps. This provides an indication that, if the battery has been discharged as the result of an inoperable battery charger, it has now been fully charged. If at the expiration of the [12] hour period, the battery float current is not less than or equal to [2] amps, there may be additional problems and the battery is considered inoperable. This verification provides assurance that the battery has sufficient capacity to perform its safety function.

New Required Action A.3 requires restoring inoperable battery charger to Operable status. Given that the DC bus remains energized, the battery discharge is terminated based on restoration of the battery terminal voltage (New Required Action A.1), and the battery is fully recharged based upon battery float current (New Required Action A.2), there is reasonable basis for extending the restoration time for an inoperable battery charger beyond the existing [2] hour Completion Time to [72] hours (New Required

Action A.3). The primary justification for the extended Completion Time is the availability of a spare battery charger that is appropriately sized to perform the design function of the charger being replaced. As stated in a Reviewer's Note in the Bases, a licensee wishing to adopt a Completion Time longer than 72 hours will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in RG 1.177 and RG 1.174. Alternatively, the 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

The second Condition (new Condition B) applies when one [or two] batteries on one train are inoperable. The Required Action states that the battery or batteries must be restored to Operable status within [2] hours. As stated in a Reviewer's Note in the Bases, a licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in RG 1.177 and RG 1.174 or provide a regulatory commitment that an alternate means of charging the batteries is available. With the batteries on one train inoperable, the DC bus is being supplied by the Operable battery charger(s). Any event that results in a loss of the AC bus supporting the battery charger(s) will also result in loss of DC power to that train. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) may rely on the batteries. In addition, the energization transients of any DC loads that are beyond the capability of the battery charger(s) and normally require the assistance of the batteries will not be able to be restored. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, inadequate battery cell voltage, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 and provide additional Required Actions and associated Completion Times.

Existing Condition A is renumbered Condition C and the exception "for reasons other than Condition A [or B]" is added. Existing Conditions B and C are renumbered Conditions D and E with no other changes.

## 4.3.2 Proposed Changes to Specification 3.8.4, "DC Sources - Operating," Surveillances

SR 3.8.4.1 is proposed to be revised from "Verify battery terminal voltage is  $\geq$  [120] V on float charge" to "Verify battery terminal voltage is greater than or equal to the minimum established float voltage." The Frequency of 7 days is unchanged. The value for the minimum established float voltage is relocated from the Specifications to the TS Bases.

The purpose of SR 3.8.4.1 is to verify the battery terminal voltage is greater than or equal to the minimum established float voltage. The specific limiting value for the minimum operating battery charging float voltage is relocated to the Bases. The battery manufacturer establishes this voltage to provide the optimum charge on the battery. This

voltage will maintain the battery plates in a condition that supports maintaining the grid life. This value can be adequately controlled in the TS Bases by the Technical Specifications Bases Control Program.

SR 3.8.4.2, SR 3.8.4.3, SR 3.8.4.4, and SR 3.8.4.5 are deleted and the associated testing will be performed under the Battery Monitoring and Maintenance Program.

In accordance with SR 3.0.1, when any SR is not met, the LCO is not met. This is based on the SRs representing the minimum acceptable requirements for operability of the required equipment. However, for SR 3.8.4.2, SR 3.8.4.3, SR 3.8.4.4, and SR 3.8.4.5, failure to meet the SR does not necessarily mean that the equipment is not capable of performing its safety function. Furthermore, the corrective action is generally a routine or preventive maintenance-type activity. These activities are inappropriate for SRs and can be controlled in the maintenance programs for batteries.

With regard to the resistance verifications of SR 3.8.4.2 and SR 3.8.4.5, the values are nominal values and represent limits at which some action should be taken, not necessarily when the operability of the battery is in question. The plant safety analyses do not assume a specific battery inter-cell connection resistance value, but typically assume that the batteries will supply adequate power. Therefore, the key issue is the overall battery connection resistance. Between surveillances, the resistance of each battery inter-cell connection varies independently from all the others. Some of these connection resistance values may be higher or lower than others, and the battery will still be able to perform its function and should not be considered inoperable. Overall connection resistance has a direct impact on operability and is adequately determined as acceptable through completion of the battery service and or modified performance discharge tests. Therefore, these activities are more appropriately controlled under the proposed Battery Monitoring and Maintenance Program. Licensees must provide a basis for the relocated cell connection resistance limit ([150 µOhm] or a revised monitoring value).

SR 3.8.4.6 (now SR 3.8.4.2) specifies battery charger current requirements for each DC source, and its purpose is to verify the design capacity of each battery charger. The proposed change revises this SR to be consistent with SR 3.8.4.1 by replacing the specific voltage limits with "greater than or equal to the minimum established float voltages." The voltage requirements are based on the battery charger voltage level after a response to a loss of AC power. As stated above, the battery manufacturer establishes this voltage limit to provide the optimum charge on the battery and to maintain the battery plates in a condition that supports maintaining the battery grid life. This value can be adequately controlled in the TS Bases by the Technical Specifications Bases Control Program.

An alternative criteria is added to SR 3.8.4.6 (now SR 3.8.4.2), which states, "Verify each battery charger can recharge the battery to the fully charged state within [24] hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis event discharge state."

This is an alternate method for verifying the design capacity of each battery charger. As described in the revised Bases for SR 3.8.4.2, this test would occur following a service,

performance or modified performance test. The level of loading required may not normally be available following the battery service test and may need to be supplemented with additional loads. The duration of this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage, temperature, and the exponential decay in charging current. If each battery charger is capable of recharging its respective battery within [24] hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design-basis event discharge state, the proposed alternate testing criteria would satisfy the purpose of SR 3.8.4.2.

SR 3.8.4.6 (now SR 3.8.4.2) is revised to eliminate a Note. The Note states, "This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR." This restriction is eliminated as the alternate method can be performed in MODE 1, 2, or 3 without affecting plant safety.

The Note to SR 3.8.4.7 (now SR 3.8.4.3) is revised to eliminate the "once per 60 months" restriction on performing the modified performance discharge test instead of the service test, effectively allowing the modified performance test to be used instead of the service test at any time. The licensee must confirm that the modified performance discharge test completely encompasses the load profile of the battery service test and that it adequately confirms the intent of the service test to verify the battery capacity to supply the design basis load profile.

SR 3.8.4.8 is relocated to TS 3.8.6. The relocation is discussed below.

## 4.3.4 Proposed Changes to Specification 3.8.4, "DC Sources - Operating," Bases

The Bases of Specification 3.8.4 are revised to reflect the changes described above. No other substantive changes are made.

4.4 Proposed Changes to Specification 3.8.5, "DC Sources - Shutdown"

## 4.4.1 Proposed Changes to Specification 3.8.5, "DC Sources - Shutdown" Actions

TS 3.8.5 contains a Condition for one or more DC electrical subsystems inoperable. The proposed change adds an additional Condition, which is an exception to the existing Condition. The existing Condition is renamed Condition B and modified to state "One or more DC electrical power subsystems inoperable for reasons other than Condition A." An addition condition joined by an OR is added to Condition A (new Condition B) which states, "Required Actions and associated Completion Time of Condition A not met." The Required Actions of Condition A (new Condition B), which require declaring affected required features inoperable or suspending core alterations and movement of irradiated fuel assemblies in the [secondary] containment, are not changed.

TS 3.8.5 requires DC electrical power sources to be Operable to support specific equipment and capabilities in MODE 5 and 6 and during movement of irradiated fuel assemblies. Depending on the plant design, this may require both DC electrical trains to be Operable. The new Condition A is bracketed and is included only when the plant-

specific implementation of TS 3.8.5 may require both trains of the DC electrical power system to be Operable. If the plant-specific implementation of LCO 3.8.5 required only one train of the DC electrical power system to be Operable, then Condition A is omitted and Condition B is renumbered as Condition A.

The new Condition A applies when one [or two] battery charger[s] on one train are inoperable and the redundant train battery and charger[s] are Operable. There are three Required Actions. The first Required Action states that the battery terminal voltage must be restored to greater than or equal to the minimum established float voltage within 2 hours. The second Required Action states that the battery float current must be verified to be < [2] amps once per [12] hours. As stated in a Reviewer's Note in the Bases, a plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3). The third Required Action states that the battery charger[s] must be restored to Operable status. The third Completion Time is [72] hours. As stated in a Reviewer's Note in the Bases, a licensee wishing to adopt a Completion Time longer than 72 hours must demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in RG 1.177 and RG 1.174. Alternatively, the 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

As described in the discussion of the changes to TS 3.8.4, above, given that the DC bus remains energized, the battery discharge is terminated based on restoration of the battery terminal voltage (New Required Action A.1), and the battery is fully recharged based upon battery float current (New Required Action A.2), there is reasonable basis for extending the restoration time for an inoperable battery charger beyond the existing [2] hour Completion Time to [72] hours (New Required Action A.3).

The change to the existing Condition A (new Condition B) to address the situation in which the Required Actions and associated Completion Times of new Condition A are not met provides conservative actions to be followed.

## 4.4.2 Proposed Changes to Specification 3.8.5, "DC Sources - Shutdown," Surveillances

SR 3.8.5.1 is revised to reflect the relocation or elimination of Surveillances in TS 3.8.4. This change is administrative and reflects the changes justified above.

## 4.4.3 Proposed Changes to Specification 3.8.5, "DC Sources - Shutdown," Bases

The Bases of Specification 3.8.5 are revised to reflect the changes described above. No other substantive changes are made.

4.5 Proposed Changes to Specification 3.8.6, "Battery Parameters"

## 4.5.1 Proposed Changes to Specification 3.8.6, "Battery Parameters " Title and LCO and Deletion of Table 3.8.6-1

TS 3.8.6, "Battery Cell Parameters," is renamed "Battery Parameters." The LCO is revised to refer to battery parameters, instead of battery *cell* parameters, being within limits. These changes are editorial and reflect the revised requirements, as described below.

The TS 3.8.6 LCO is revised to refer to the [name] "electrical power subsystem batteries" instead of the [name] "batteries," where "name" is "Train A and B" or "station service and DG," depending on plant type. This adds consistency with the LCO 3.8.4 and LCO 3.8.5 descriptions of the separate and independent electrical power subsystems and uses the term "subsystem," which appears in the Conditions, in the LCO.

LCO 3.8.6 is revised to remove the reference to Table 3.8.6-1. Table 3.8.6-1, "Battery Cell Parameter Requirements," is deleted.

TS Table 3.8.6-1 specifies the battery cell parameter requirements, including electrolyte level, float voltage, and specific gravity. The Category A and B values of TS Table 3.8.6-1 represent appropriate monitoring levels and appropriate preventive maintenance levels for long-term battery quality and extended battery life. The definition of Limiting Condition for Operation (LCO) presented in 10 CFR 50.36 states that LCOs are "the lowest functional capability or performance levels of equipment required for safe operation of the facility." As such, the Category A and B values for cell voltage and electrolyte level do not reflect the 10 CFR 50.36 criteria for LCOs. It is proposed that these values and the Required Actions associated with restoration be relocated to a licensee-controlled program, required and described in TS Section 5.5, "Program," and titled the "Battery Monitoring and Maintenance Program." This provides adequate assurance that the battery parameter values will continue to be controlled and actions will be implemented if the battery parameter values are not met. Furthermore, the battery and its preventive maintenance and monitoring program are under the regulatory requirements of 10 CFR 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants."

The Category C specific limiting values of TS Table 3.8.6-1 for the battery electrolyte levels have also been proposed to be relocated to a licensee-controlled program. However, new TS 3.8.6, Conditions C and D, will require the electrolyte temperature (pilot cell only) and level (any battery cell) to be greater than or equal to minimum established design limits. Depending on the available excess capacity of the associated battery, the minimum temperature necessary to support operability of the battery can vary. Relocating these values to a licensee-controlled program will provide the licensee with added flexibility to monitor and control this limit at values directly related to the battery's ability to perform its assumed function.

The TS Table 3.8.6-1, Category C, limiting value for float voltage is eliminated and instead the new SR 3.8.6.2 will require monitoring of float voltage. This change is discussed below under SR 3.8.6.2.

The TS Table 3.8.6-1, Category C, limiting value for specific gravity is eliminated as the method of verifying battery state of charge and instead the new SR 3.8.6.1 will require monitoring of float current. This change is discussed below under SR 3.8.6.1.

## 4.5.2 Proposed Changes to Specification 3.8.6, "Battery Parameters " Actions

The existing TS 3.8.6 Condition A is deleted and replaced with the following Conditions:

- New Condition A addresses the condition in which one or more batteries with one or more battery cells float voltage less than [2.07] V.
- New Condition B addresses the condition in which one or more batteries with float current greater than [2] amps.
- New Condition C addresses the condition in which one or more batteries with one or more cells electrolyte level less than the minimum established design limits.
- New Condition D addresses the condition in which one or more batteries with pilot cell electrolyte temperature less than minimum established design limits.
- New Condition E addresses the condition in which two or more redundant division battery parameters not within established limits.

Current Condition B will be renamed as new Condition F. The current Condition B consists of three separate entry Conditions and the Required Action is to declare the associated battery inoperable. As part of this proposed change, the last two entry Conditions will be deleted. The deleted Conditions will be replaced with two new Conditions requiring entry when one or more batteries with one or more battery cells float voltage of less than [2.07] V or float current greater than [2] amps.

New TS 3.8.6, Condition A addresses what was formerly the Category C limit for float voltage in TS Table 3.8.6-1. This new Condition would be applicable when one or more batteries on one train are found with one or more battery cells with a float voltage less than [2.07] V. Once Condition A has been entered, the battery cell is considered degraded and the Required Actions are to verify within 2 hours: (A.1) the battery terminal voltage to be greater than or equal to the minimum established float voltage (SR 3.8.4.1), and (A.2) that each battery's float current is less than or equal to [2] amps (SR 3.8.6.1). The above actions assure that there is still sufficient battery capacity to perform its intended function without considering the battery inoperable. Continued operations up to 24 hours is proposed to allow the restoration of the affected cell(s) voltage to greater than or equal to [2.07] volts.

New TS 3.8.6, Condition B addresses battery state-of-charge. This new Condition B would be applicable when one or more batteries is found with a float current greater than

[2] amps. A float current of greater than [2] amps provides an indication that a partial discharge has occurred. The Required Action is to verify within 2 hours that the battery terminal voltage is greater than or equal to the minimum established float voltage (SR 3.8.4.1), thus confirming battery charger operability. If the terminal voltage is satisfactory, Required Action B.2 of Condition B assures that within [12] hours the battery will be restored to its fully-charged condition from any discharge that might have occurred due to a temporary loss of the battery charger. As stated in the Reviewer's Note for Condition B, if a plant cannot meet the [12] hour Completion Time due to an inherent battery charging characteristic, they can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

If the terminal voltage is found to be less than the minimum established float voltage, it indicates that the battery charger is either inoperable or is operating in the current limit mode. If the battery charger is operating in the current limit mode for 2 hours, it is an indication that the battery has been substantially discharged and likely can not perform its required design functions. In this case, new Condition F is entered.

If float voltage is not satisfactory, revised Condition F of TS 3.8.6 would be applicable and the battery must be declared inoperable immediately.

New TS 3.8.6, Condition C addresses the level of the electrolyte in a cell. This new Condition C would be applicable when one or more batteries is found with one or more cells' electrolyte level is less than the minimum established design limits. If the level is above the top of the battery plates, but below the minimum limit (i.e., minimum level indication mark on the battery cell jar), the battery still has sufficient capacity to perform its intended safety function and is not considered inoperable. With the cell(s) electrolyte level below the top of the plates, there is a potential for dry-out and plate degradation. New Required Actions C.1 and C.2 restore the electrolyte level and ensure that the cause of the loss of electrolyte level is not due to a leak in the battery cell jar. These changes, with the additional requirements in the Battery Monitoring and Maintenance Program, are adequate to ensure that minimum electrolyte levels are maintained.

New TS 3.8.6, Condition D applies to a battery found with a pilot cell electrolyte temperature less than the minimum established design limit. This Condition would be applicable when one or more batteries has a pilot cell electrolyte temperature of less than the minimum established design limits. A low electrolyte temperature limits the current and power available from the battery. Batteries are normally sized with correction margins that include temperature and aging, and as previously mentioned, [5] percent design margin will be maintained. The temperature of the room containing the batteries is typically monitored during operator rounds. Since batteries have very large thermal inertia, it is highly probable that a room temperature excursion would be corrected prior to the battery reaching minimum temperature. The pilot cell temperature is an accurate representation of the temperature of the battery bank because: (1) batteries having very large thermal inertia; (2) the batteries are designed with significant margins (i.e., temperature, aging, and design); and (3) the monitoring and correction of low battery

room temperatures. Therefore, the 12 hour CT provides a reasonable time to restore the electrolyte temperature within established limits.

Due to the use of [2.07] V as the minimum limit for cell voltage and the use of pilot cell temperature in lieu of average cell temperature, changes are necessary in the way pilot cells are selected. In the past, pilot cells were selected to represent average cells in the battery. The change to [2.07] V now requires pilot cells to be selected to represent the lowest voltage cells in the battery. This ensures that the other cells are above the pilot cell voltage which must remain above the TS limit.

Previously, average battery temperature was monitored instead of pilot cell temperature. As a result, temperature was not a criterion with selecting a pilot cell. In order to use pilot cell temperature instead of average battery temperature, temperature must be used as a criteria when selecting the pilot cell. This may result in different pilot cells for temperature monitoring and voltage monitoring.

For batteries where it could be shown that the maximum temperature deviation across the battery did not exceed the IEEE 450 recommended maximum of 5°F, the NRC has accepted that cell temperature was not a critical parameter. Therefore for these batteries, cell temperature did not have to be taken into account when selecting pilot cells. For batteries where the temperature deviation exceeds 5°F, the licensee has several options. The first is to continue to use average cell temperature and use it in lieu of pilot cell temperature. The second is to perform the necessary analysis to demonstrate that sufficient margins exist in sizing to compensate for using the warmest cell as the pilot cell. Other options include using cell temperature as a criteria in selecting the pilot cell or to select a separate pilot cell that reflects the average battery temperature.

Another difference in this approach is rotating pilot cells. Past practices have been to rotate pilot cells on an annual basis and to not reuse cells that have previously been pilot cells. The reason for rotation and not reusing cells was to prevent loss of specific gravity by repeated sampling. With the transition to float current monitoring, this concern is no longer valid and pilot cells should be selected based on the preceding discussion without regard to whether or not they have been used previously. The same is true for rotating pilot cells. Pilot cell selection should be evaluated at a minimum at each outage to ensure they continue to meet the selection criteria.

New TS 3.8.6, Condition E addresses the condition in which two or more redundant division battery parameters are not within established limits. If this condition exists, there is not sufficient assurance that the batteries will be capable of performing their intended safety function. With redundant batteries involved, loss of function is possible for multiple systems that depend upon the batteries. The battery parameters for the affected battery in one division must be restored to within limits within 2 hours, which is consistent with the Completion Time to restore an inoperable DC bus.

New TS 3.8.6, Condition F provides a default condition for battery parameters that fall outside the allowance of the Required Actions for Condition A, B, C, D, or E. Under this condition, it is assumed that there is not sufficient capacity to supply the maximum

expected load requirements. New Condition F also addresses the case where one or more batteries is found with one or more battery cells having a float voltage less than [2.07] V and a float current greater than [2] amps. This Condition provides reasonable actions to respond to this Condition.

## 4.5.3 Proposed Changes to Specification 3.8.6, "Battery Parameters" Surveillances

The existing SR 3.8.6.1 (verify battery cell parameters meet Table 3.8.6-1 Category A limits), SR 3.8.6.2 (verify battery cell parameters meet Table 3.8.6-1 Category B limits), and SR 3.8.6.3 (verify average electrolyte temperature of representative cells) are deleted. The deleted SRs are replaced with SR 3.8.6.1 for float current, SR 3.8.6.2 for pilot cell voltage, SR 3.8.6.3 for electrolyte level, SR 3.8.6.4 for pilot cell temperature, SR 3.8.6.5 for connected cell voltage, and SR 3.8.6.6 for discharge testing.

The elimination of existing SR 3.8.6.1 and SR 3.8.6.2 is consistent with the elimination of Table 3.8.6.1, discussed above. The Table 3.8.6-1, Category A and B limits do not represent a condition in which the batteries cannot perform their function. Therefore, SRs which verify that the Table 3.8.6-1 Category A and B limits are met are inconsistent with the 10 CFR 50.36 definition of "Surveillances," and SR 3.0.1, which state that Surveillances verify that the Limiting Condition of Operation is met. Existing SR 3.8.6.3 is replaced with new SR 3.8.6.4, as discussed below.

New SR 3.8.6.1 requires verification that the float current for each battery is less than or equal to [2] amps every 7 days. Float current is used to indicate the state-of-charge instead of specific gravity. The purpose of this SR is to determine the state-of-charge of the battery. Float charge is the condition in which the battery charger is supplying the continuous small amount of current (i.e., less than [2] amps) required to overcome the internal losses of a battery to maintain the battery in a fully charged state. The float current requirements are based on the float current indicative of a charged battery. As stated above, the use of float current to determine the state-of-charge of the battery is consistent with the battery manufacturer recommendations and must be supported by documentation from the battery manufacturer.

New SR 3.8.6.2 and SR 3.8.6.5 require verification that the float voltage of pilot cells and all connected cells are greater than or equal to [2.07] V every 31 and 92 days, respectively. This voltage level represents the point at which battery operability is in question. The Battery Monitoring and Maintenance Program in TS Section 5.5 will include actions to restore battery cells with float voltage less than [2.13] V and actions to verify that the remaining cells are greater than or equal to [2.07] V when a cell or cells have been found to be less than [2.13] V.

New SR 3.8.6.3 requires verification that the connected cell electrolyte level of each battery is greater than or equal to the minimum established design limits every 31 days. Operation of the batteries at electrolyte levels greater than the minimum established design limit ensures that the battery plates do not suffer physical damage and continue to maintain adequate electron transfer capability.

New SR 3.8.6.4 requires verification that the temperature of each battery pilot cell is greater than or equal to the minimum established design limits every 31 days. It replaces existing SR 3.8.6.3, which required verifying the average (versus pilot cell) electrolyte temperature every 92 days. As discussed above, batteries have very large thermal inertia; the batteries are designed with significant margins (i.e., temperature, aging, and design); and there is monitoring and correction of low battery room temperatures. As a result, the pilot cell temperature is an accurate representation of the temperature of the battery bank and is adequate to ensure that the minimum electrolyte temperature is maintained. However, because only the pilot cell temperature is determined, the Frequency is increased from 92 days to 31 days.

The specific limiting values for the battery electrolyte temperature and level are relocated to licensee control. SR 3.8.6.3 and SR 3.8.6.4, respectively, require the electrolyte level and temperature to be greater than or equal to the "minimum established design limits." Depending on the available excess capacity of the associated battery, the minimum temperature necessary to support operability of the battery can vary. Relocation to licensee controlled programs can allow flexibility to monitor and control this limit at values directly related to the battery ability to perform its assumed function.

The new SR 3.8.6.6 is relocated from existing SR 3.8.4.8. Relocating existing SR 3.8.4.8 to new SR 3.8.6.6 is appropriate because the SR demonstrates the operability of the battery, and is therefore more appropriate to be included in TS Section 3.8.6.

## 4.5.4 Proposed Changes to Specification 3.8.6, "Battery Parameters " Bases

The Bases of Specification 3.8.6 are revised to reflect the changes described above.

The Bases for SR 3.8.6.1 specify that the equipment that is used to monitor float current will have the necessary accuracy and capability to measure electrical currents in the expected range.

## 4.6 Proposed Addition of the "Battery Maintenance and Monitoring Program" to Section 5.5 of the TS

A new administrative program, the Battery Monitoring and Maintenance Program, is added to Section 5.5, "Programs," of the TS. The monitoring of the current battery parameters (i.e., specific gravity, electrolyte level, cell temperature, float voltage, connection resistance, and physical condition) is relocated to this program. This will ensure that the battery parameter values will continue to be controlled and that actions will be implemented should the battery parameter value not be met. Furthermore, the battery and its preventive maintenance and monitoring program are under the regulatory requirements of 10 CFR 50.65. The licensee's program should include a provision to obtain specific gravity readings of all cells at each discharge test, per manufacturer and NRC recommendations.

The program states:

"This Program provides for battery restoration and maintenance, which includes the following:

- a. Actions to restore battery cells with float voltage < [2.13] V;
- b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plates; and
- c. Actions to verify that the remaining cells are > [2.07] V when a cell or cells have been found to be < [2.13] V."

## 4.7 Verifications and Regulatory Commitments

In order to adopt this change, licensees must make the following verifications and regulatory commitments in their license amendment request (LAR). It is anticipated that these verifications and commitments will be captured in the CLIIP model application.

## 4.7.1 Verifications

- 1. In an attachment to the LAR, the licensee must provide letters from the manufactures of the batteries used at the plant verifying the acceptability of using float current monitoring instead of specific gravity monitoring as a reliable and accurate indication of the state-of-charge of the battery and that this will hold true over the life of the battery.
- 2. The licensee must verify that battery room temperature is routinely monitored such that a room temperature excursion could reasonably expect to be detected and corrected prior to the average battery electrolyte temperature dropping below the minimum electrolyte temperature.
- 3. The licensee must verify that the equipment that will be used to monitor float current under SR 3.8.6.1 will have the necessary accuracy and capability to measure electrical currents in the expected range.
- 4. If the licensee requests a Completion Time greater than 72 hours for TS 3.8.4, Required Action A.3, and / or TS 3.8.5, Required Action A.3, the licensee must verify the availability of a spare battery charger that is appropriately sized. As stated in a Reviewer's Note in the Bases, a licensee wishing to adopt a longer Completion Time must also demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

  Alternatively, the 7 day Completion Time can be justified by an acceptable alternate method, such as a regulatory commitment that an means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply.

- 5. If the licensee requests a Completion Time greater than 2 hours for TS 3.8.4, Required Action B.1 or C.1, the licensee must demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."
- 6. The cell resistance limits in existing SR 3.8.4.5 are relocated to the Battery Monitoring and Maintenance Program. Licensees must verify the basis for the relocated cell connection resistance limit ([150] µOhm or a revised monitoring value).
- 7. In order to delete the SR 3.8.4.7 (now SR 3.8.4.3) Note "once per 60 months" restriction on performing the modified performance discharge test instead of the service test, the licensee must confirm that the modified performance discharge test completely encompasses the load profile of the battery service test and that it adequately confirms the intent of the service test to verify the battery capacity to supply the design basis load profile.

#### 4.7.2 Commitments

- 1. The [2] amp float current value is an indication that the battery is [95] percent charged. The licensee must provide a regulatory commitment to maintain a [5] percent design margin for the batteries.
- 2. The licensee must commit to relocate the limits on cell voltage and electrolyte level to a licensee-controlled program, required and described in TS Section 5.5, "Program," and titled the "Battery Monitoring and Maintenance Program." The licensee must commit to control changes to the values under 10 CFR 50.59 and to implement actions if the battery parameter values are not met.
- 3. The licensee must commit that the licensee-controlled program, required and described in TS Section 5.5, "Program," and titled the "Battery Monitoring and Maintenance Program," will require obtaining specific gravity readings of all cells at each discharge test, consistent with manufacturer recommendations.

#### 5.0 Regulatory Analysis

## 5.1 No Significant Hazards Consideration

The TSTF has evaluated whether or not a significant hazards consideration is involved with the proposed generic change by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes restructure the Technical Specifications (TS) for the direct current (DC) electrical power system. The proposed changes add actions to specifically address battery charger inoperability. The DC electrical power system, including associated battery chargers, is not an initiator of any accident sequence analyzed in the Updated Final Safety Analysis Report (UFSAR). Operation in accordance with the proposed TS ensures that the DC electrical power system is capable of performing its function as described in the UFSAR. Therefore, the mitigative functions supported by the DC electrical power system will continue to provide the protection assumed by the analysis.

The relocation of preventive maintenance surveillances, and certain operating limits and actions, to a newly-created licensee-controlled Battery Monitoring and Maintenance Program will not challenge the ability of the DC electrical power system to perform its design function. Appropriate monitoring and maintenance, consistent with industry standards, will continue to be performed . In addition, the DC electrical power system is within the scope of 10 CFR 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," which will ensure the control of maintenance activities associated with the DC electrical power system .

The integrity of fission product barriers, plant configuration, and operating procedures as described in the UFSAR will not be affected by the proposed changes. Therefore, the consequences of previously analyzed accidents will not increase by implementing these changes.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes involve restructuring the TS for the DC electrical power system. The DC electrical power system, including associated battery chargers, is not an initiator to any accident sequence analyzed in the UFSAR. Rather, the DC electrical power system is used to supply equipment used to mitigate an accident.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The margin of safety is established through equipment design, operating parameters, and the setpoints at which automatic actions are initiated. The proposed changes will not adversely affect operation of plant equipment. These changes will not result in a change to the setpoints at which protective actions are initiated. Sufficient DC

capacity to support operation of mitigation equipment is ensured. The changes associated with the new battery maintenance and monitoring program will ensure that the station batteries are maintained in a highly reliable manner. The equipment fed by the DC electrical sources will continue to provide adequate power to safety related loads in accordance with analysis assumptions.

Based on the above, the TSTF concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

## 5.2 Applicable Regulatory Requirements / Criteria

The following NRC requirements and guidance document are applicable to the review of the proposed change.

Title 10 of the Code of Federal Regulations (10 CFR) Part 50 Appendix A, General Design Criterion (GDC) 17, "Electric power systems," requires, in part, that nuclear power plants have onsite and offsite electric power systems to permit the functioning of structures, systems, and components (SSCs) that are important to safety. The onsite system is required to have sufficient independence, redundancy, and testability to perform its safety function, assuming a single failure. The offsite power system is required to be supplied by two physically independent circuits that are designed and located so as to minimize, to the extent practical, the likelihood of their simultaneous failure under operating and postulated accident and environmental conditions. In addition, this criterion requires provisions to minimize the probability of losing electric power from the remaining electric power supplies as a result of loss of power from the unit, the offsite transmission network, or the onsite power supplies.

GDC 18, "Inspection and testing of electric power systems," requires that electric power systems that are important to safety must be designed to permit appropriate periodic inspection and testing.

10 CFR 50.63, "Loss of all alternating current power," requires that each light-water cooled nuclear power plant licensed to operate must be able to withstand for a specified duration and recover from a station blackout (SBO).

10 CFR 50.36, "Technical specifications," requires a licensee's TSs to establish limiting conditions for operation (LCOs), which include completion times (CTs) for equipment that is required for safe operation of the facility.

10 CFR 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," requires that preventive maintenance activities must not reduce the overall availability of the SSCs.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the

Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

#### **6.0 Environmental Considerations**

A review has determined that the proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

#### 7.0 References

- 1. Letter from Exelon to U.S. NRC dated December 9, 2004, "Request for Amendment to Technical Specifications Associated With Direct Current Electrical Power," (ML043450492).
- 2. Letter from U.S. NRC to Exelon dated December 19, 2006, "LaSalle County Station, Units 1 And 2 Issuance Of Amendments Re: Technical Specification Task Force Standard Technical Specification Change Traveler 360, Revision 1, "DC Electric Rewrite" (TAC Nos. Md5771 And Md5772)."
- 3. Technical Specifications Task Force Traveler TSTF-360-A, Revision 1, "DC Electrical Rewrite," dated November 11, 2000.
- 4. Letter from William Beckner (NRC) to Anthony Pietrangelo (NEI) dated December 18, 2000, approving TSTF-360, Revision 1.

## **Enclosure 1**

**Battery Primer for Nuclear Power Plants** 

## **ENCLOSURE 1**

## Battery Primer for Nuclear Power Plants 01/07/2000

### Purpose:

At the request of NEI & EXCEL, a Primer for decisions relative to Batteries & DC systems follows. The Primer discusses the difference between operability of the DC system and various battery performance parameters and suggested maintenance activities, identified in IEEE 450. The discussion provides technical rationales for preparation of the Tech Spec Bases. It includes lessons learned from battery manufacturers, battery experts, technical papers, experience, field and laboratory tests, and discussions at SCC 29 and the IEEE 308 working group, SC 4.1. The discussion supplements prior discussions held between John Coyle, Kurt Uhlir, Kyle Floyd, Bob Beavers, Dan Williamson, John Knox, Saba Saba, and Nanette Gilles during an IEEE SCC 29 Nuclear Task Force review of several drafts of DC Technical Specifications.

## References, Communications & papers:

- 1) Storage Batteries, George Wood Vinal, June, 1967. Library of Congress #54-12826
- 2) IEEE 450 -1995
- 3) IEEE 485 1997
- 4) IEEE 308 Interpretation (See Enclosure to this Attachment)
- 5) Return to Service white paper by Kyle Floyd

#### Assumptions, Rules, Design Criteria:

The Discussions centered around battery systems commonly found in Nuclear Power plants serving as 1E backup power for safety related systems.

- 1) The battery grid has a flat plate lead calcium or flat plate lead antimony construction.
- 2) The active component of the Positive Plate, when charged, consists of lead dioxide
- 3) The active component of the Negative plate, when charged, consists of lead oxide.
- 4) The Cells of the Battery are vented to atmosphere.
- 5) The Cells of the Battery are flooded with electrolyte.
- 6) The battery has a rubber or plastic separator.
- 7) The positive plate material is covered by a mat on both sides. The mat maintains electrical contact between loose lead dioxide particles and the positive plate.
- 8) The nominal Specific gravity added to the Cell when filled is 1.215 plus .010 minus .005.
- 9) When a cell has no current flow, it is at it's open circuit potential. At any voltage above this potential, the plates are charging. At a potential below this voltage,

the plates have been discharged. The open circuit voltage of a cell with 1.215 specific gravity uniformly mixed, is approximately 2.061 volts. E(open circuit) = approximately 0.846 + SG. The equation that approximates the open circuit voltage is defined by the Nernst Equation. The NERNST equation provides a theoretical voltage for an ideal battery with no current flow. It can be expressed as a ratio of tetravalent lead ions to divalent lead ions.

**Nernst Equation** (Vinal, pg. 179, equation 9)

$$E=E_0 + [(R \times T)/(2 \times F)] \ln [Pb^{4+}/Pb^{2+}] = 1.87 + .029 \log [Pb^{4+}/Pb^{2+}]$$

The equation can be restated as internal (open circuit) cell voltage = base cell voltage plus [(Universal Gas Constant x Temperature)/(2 x Faradays constant)] x natural log of the ratio of the concentrations of the reactants (active material). As temperature rises the cell voltage rises. P

The equation can be used to plot the open circuit voltage over a range of reactants. As the ratio of the reactants increases, the cell voltage rises as the natural log of the ratio. [1/1 = 0, 10/1 = 2.3, 100/1 = 4.6, 1000/1 = 6.9].

Reactant Ratio	<u>E (volts)</u>
1	1.87
10	1.99
100	2.00
1000	2.07
10000	2.14

As Acid concentration increases, hydroxl ions decrease (OH<sup>-</sup> decreases, PH lowers). As OH<sup>-</sup> decreases, tetravalent lead ions increase w. The ratio increases and voltage rises. (Vinal, pg. 190)

Estimated and Measured values for the density of specific gravity to E (25 degrees C) are provided below. (Vinal, pg. 192, Table 39) The relationship between E and the specific gravity is established at the gravity of interest, 1.215.

<u>SG</u>	<u>%H<sub>2</sub>SO<sub>4</sub></u>	Estimated E	Measured E	Measured E - SG
1.03	4.55	1.878	1.878	
1.05	7.44	1.905	1.907	
1.1	14.72	1.960	1.961	
1.15	21.38	2.005	2.006	
1.2	27.68	2.048	2.049	.849
1.25	33.8	2.095	2.095	.845
1.28	37.4	2.125	2.125	.845
1.30	39.7	2.144	2.144	.844

To find the voltage for 1.215 specific gravity, the value (x volts) is extrapolated between a battery with a 1.2 specific gravity (.849 volts) and a battery with a 1.25 specific gravity (.845 volts). Solving for x:

$$(.849 - .845) / (1.2 - 1.25) = (.849 - x) / (1.2 - 1.215)$$

x = .846.846 + 1.215 = 2.061 volts (approximately 2.06 volts)

## The plates are charging above 2.06 volts. The plates have discharged when below 2.06 volts. The cell is fully charged at 2.06 volts.

- 10) Negative Plate pellets (PbO or Sponge Lead) shrink over time. Organic or Inorganic Expanders are used to maintain the pellet size and grid contact. The expander changes the polarization of the Positive and Negative plates resulting in undercharging of the positive plate. Small amounts of Platinum (or other substances) are added to the electrolyte at the time of initial charge. The Platinum is attracted to the surface of the negative plate and intermingles with the PbO. The Platinum maintains the correct negative polarity, and consequentially the correct positive plate polarities. This assures consistent charging over time. As the battery ages the Platinum molecules are over-plated and it's stabilizing influence diminishes.
- 11) The battery is normally in the float voltage range recommended by the manufacturer. This range maintains the plates in a condition that the polarity of the positive & negative plate does not convert from lead dioxide/oxide to lead sulfate & the grid life is 20 years.
- 12) A cell, when removed from charge with no load (open circuited) will gradually drift from the potential that it was at to the open circuit voltage. A battery removed from charge that is supplying loads will drop quickly to less than 2.0 volts per cell.
- The battery performance is generally limited by the charge on the positive plate. The charge on the positive plate is important. There is usually excess sulfuric acid (electrolyte) and excess negative plate material available for the chemical reaction in the design of the cell. Establishing a small positive polarity will retard self discharge for a significant length of time.
- 14) The battery is sometimes placed in equalization to mix the sulfuric acid or establish correct polarities on the plates and balance cell potentials in the string. This results in higher currents.
- 15) The current drawn by a charged battery is determined experimentally. It is displayed in a Tafel curve.
- 16) Any voltage greater than or equal to the open circuit voltage for each cell provides assurance that the cell is not discharging. Localized discharges may occur due to internal conduction paths. This is acceptable because the localized discharge does not affect a significant percentage of the material. When the cell discharges it follows the Nernst equation. The voltage drops logarithmically as the ratio of the reactants is converted to lead sulfate.
- 17) The qualified life of the battery is greater than 20 years.
- 18) The limiting component in the aged battery is the grid. The failure is due to corrosion of the grid. This increases the resistance of the grid and limits the current available from the battery.
- Other degraded conditions may exist in a battery cell beyond the loss of the conduction path. These do not result in a performance decrease as significant as a loss of conduction.
  After the battery is charged, sulfation develops due to low cell voltage.

Minor internal conduction paths develop between the positive and negative plates. This includes treeing, mossing, material deposits in the bottom of the jar, and separator failures.

The external connections of the battery cells corrode.

The electrolyte evaporates.

The spark arrestor vent path is bypassed by additional vent paths to atmosphere.

- When the battery is discharged, the bottom of the plates provided the majority of the chemical reactants. The sulfuric acid is denser at the bottom of the plate. This effect has been seen in numerous cell teardowns. When electrolyte levels are low, slightly below the top of plates there is little change in capacity. The density of the acid increases with evaporation. This increase, more than offsets the slight decrease in surface area. The loss of electrolyte provides a small loss in long rate (20 hour) capability and provides a boost in short term high rate capability.
- 21) Equalization of the battery results in gas developing on the cell plates. High rate discharges are affected by about 2%. Equalization voltages increase water usage, increase grid corrosion, and age the positive plate active material. The battery should not be kept on the permanent equalize state.
- 22) The battery ratings are established by test and include the coup de foet effect. The coup de foet is the initial reluctance of the battery to respond to an initial application of a load. The battery is sized using IEEE 485 methodology and the manufacturer's rating curves.
- 23) In Technical Specifications, when equipment is inoperable, time limits are imposed which ensure the equipment is restored to an operable status or the system & plant are placed in a safe status. While in these time periods, the single failure criterion does not apply. Credit may be taken for all operable redundant equipment to safely shutdown the plant.
- 24) The Units that adopt the Technical Specifications with operability limits will adopt procedures and programs, which use IEEE 450 recommended practices & limits for evaluating the battery to the Maintenance Rule.
- 25) The Design Basis Accident bounds the radiological release to the public.
- 26) The 1E battery is sized to a specific load profile for the Design Base Accident. During other accidents and events with lower radiological releases, the load may vary from the Design Base Event at any specific time, specific components may require more or less voltage, the amp-hours removed from the battery may be greater or less than the Design Base Accident as a function of charger return to service time, running load, and operator actions. The conditions prior to the onset of the event may differ from those assumed for the Design Base Accident; electrolyte temperature may be more favorable, normal equipment availability and operating conditions may be assumed, and the requirement to consider a single failure may not be applicable. The Examples of the less bounding events are Fire Safe Shutdown scenarios, Station Black Out, and high energy line breaks.
- 27) Although the charger may be restored quickly, the battery, alone, is designed to energize the required safety loads and other non-shed non safety loads required for the Design Basis Accident. The safety related loads will be capable of performing their design function. The design shall preclude non-shed non

- safety loads from operating in a manner that would prevent the safety related loads from performing their safety function.
- 28) The battery shall be sized for design environmental conditions, specifically low electrolyte temperature, under which the discharge battery is expected to occur.
- 29) Battery degradation is monitored through capacity testing. The battery is oversized a minimum of 125%. Reduction of the battery capacity below 80% indicates that a margin review should be made to determine if the battery will is capable of supplying the loads present during a Design Base Accident. Margin would indicate that the battery is capable of fulfilling it's safety function.
- 30) Capacity testing evaluates the battery active components. It should be performed near the highest state of charge reasonably achieved in service.
- The level of charge is evaluated by measuring current at a specific voltage, typically float voltage in normal operation or equalize voltage while recharging. When the charger is switched from equalize to float, charging current will decrease. A typical Tafel curve would suggest that float current will be 10 to 20% of the current in equalize.
- 32) Battery degradation is monitored through cell parameters. When cell parameters are slightly outside of specification, it indicates a insignificant or small loss of capability.
- When not in the Design Base Accident, the battery shall support the charger when the charger is energized. Peak loads exceeding the charger's current limit, may be provided by the battery.
- 34) Due to the complexity of the charging system and it's power sources, the availability of the charger to perform it's safety function is different from the battery. The battery reliability is higher than the charger. The maintenance actions required to return a charger to service are more complex than returning a battery to service. Core Damage frequency is reduced by designing the DC system to perform the Design Base Accident on the battery alone, and allowing longer out of service times for the battery charger. The performance of the charger is enhanced by allowing Out of Service times sufficient to plan, identify problems, perform maintenance activities, and verify performance of the charger under a reasonable time frame.
- 35) A battery charger's safety function is to maintain the battery in a state of readiness, charged sufficiently to supply the loads required during the Design Base Accident.
  - The capacity of each battery charger shall be based on the largest combined demands of the various continuous steady state loads.
- A battery charger's safety function is to stabilize the discharge of Design Basis Accident at the completion of the duty cycle. The stabilization ensures that sufficient reserves are present in the battery to provide for loads in excess of the battery charger capability.

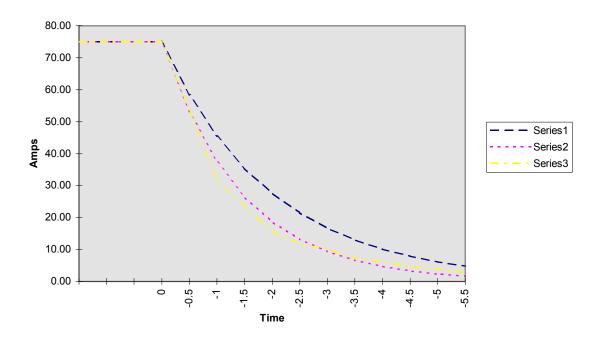
37) The battery charger shall also be capable of charging the battery at completion of the accident after normal environmental conditions (approximately 77 degrees F) have been restored. Although the charger may be capable of providing charging current at cold temperatures, a cold battery will not accept the charge. As a minimum, the charger should be capable of providing it's necessary current at low float voltage. It is acceptable to show by test that the charger will restore the battery to a state of readiness, in which the stored amphours are sufficient to meet the Design Base Accident current profile, maintaining the terminal voltage above that required by the DC system and components.

The level of charge required to be restored by the charger is that charge which would be sufficient to maintain bus voltages while perform the bounding design base discharge. The time period considered for sizing the charger may be established using IEEE 946 methodology. This methodology assumes that the battery accepts all of the charge at the rating or current limit of the charger. This bounds the maximum current and the charger can be expected to supply. The maximum current ensures that the charger rating is adequately sized. The time period for actually charging the battery is expected to be larger, due to the response of the battery cells. Typical cells decrease the current they will accept exponentially, between 60 and 80 percent charge. The total energy returned to the charger is equivalent to the previous method, current is lowered as time increases. The time period for restoring the battery is dependent on temperature, the charger current limit, the charger voltage, and the depth of discharge and the battery cell condition.

The capacity of each battery charger shall be based on charging capacity to restore the battery after the bounding design basis event discharge to a state that the battery can perform its design basis function regardless of the status of the plant. The time period considered for sizing the charger shall be as stated in the design basis of the plant.

38) Battery current, when charged using constant voltage, has an exponential form. Examples of constant voltage charging are provided below.

#### **Recharge Curve**



For a given depth of discharge, the recharge voltage determines the length of time in current limit. While in current limit the battery is converting the returned amps efficiently into stored energy. Some thermal losses exist. Between 60 and 80% of charge the battery cell voltage rises to the charging voltage and the current reduces exponentially. As the cell voltage approaches the charging voltage, efficiency in converting to stored energy decreases and gasses form. Maintaining the charger at high voltage returns the charge rapidly, however cells at voltages near the lower range of float voltage will also return the energy to the stored condition.

Recharge data has been analyzed for 250 VA batteries. Recharges to the point when the trickle charge was less than 1 amp with float voltage at the low end of the float voltage range, enabled batteries to be at 98 % of the charge possible. At low float voltage, 2 amps is appropriate for cells with 8 hour capacities of 1000 AH or larger.

Charging data has been provided by Yuasa for 50 Amp-Hour and 150 Amp-Hour cells. The CC-3 is charged at the high end of the float voltage range & the CC-9 is charged at the low end of the equalization range. Both indicate recharges of near 100% or greater for low float current. These are provided in an attachment to this Primer.

The IEEE SCC 29 reviewed and endorsed Kyle Floyd's Return to Service white paper. It analyzes when a battery has available 95% of its charge based on the charger's rating. Although actual current limits are slightly greater than the charger rating, the charger rating is typically used to evaluate the recharge time. The paper establishes that 95% of the charge has been replaced when the charge current reaches 13% of the charger rating when measured at equalize voltage. Most batteries, when charged after a capacity test, are charged at the equalize voltage. This ensures that, for the same depth of discharge, the charger stays in current limit longer than when charged at low float voltage. A greater percentage of the amp-hours are thus returned in the current limit phase of the charge.

Examples of the charging current at 2.33 volts per cell, which would indicate 95% charge has been returned are provided for different rating chargers.

Charger Rating (Amps)	Charging Current (Amps @ 2.33 VPC, 95% charge)
50	6
75	9
100	13
150	19
200	26
300	39
400	52
500	65
600	78

To achieve the above results, it is also acceptable to leave the charger in the float mode until it comes out of current limit, then switch to the equalize mode. The charger current will then rise to current limit again.

## **Attachment to Enclosure 1**

March 21, 1999 TO: J.K. Coyle PECo Energy

SUBJECT: Interpretation of Standard 308-1991

The following is the response to your Request for Interpretation of Standard 308-1991. It is the result of your meeting with Nuclear Power Engineering Committee SC4.1 Working Group for IEEE 308. The response has been approved by the full committee.

The paragraphs cited have been reviewed and found to give a clear set of requirements except for Paragraph 6.3.4(3). To clarify the paragraph, it should be interpreted as follows:

"Section 6.3.4(3) Capacity: The capacity of each battery charger shall be based on the largest combined demands of the various continuous steady state loads plus charging capacity to restore the battery after the bounding design basis event discharge to a state that the battery can perform its design basis function regardless of the status of the plant. The time period considered for sizing the charger shall be as stated in the design basis of the plant."

The standard is undergoing a revision at this time. The words developed to provide the interpretation will be considered in the revision process.

Very Truly Yours,

Britton P. Grim Chairman, PES NPEC

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(Note added by). Coyle)

At the time this response was prepared, the working group of this response were asked to define the term "status" in the phrase "regardless of the status of the plant". The members of the working group defined this term as the plants "operational condition", e.g. OPCON 1 through 5(6), but would not permit the use of a term used in Technical Specifications within the standard.

## **Enclosure 2**

A Proposed Method for Selecting the Return to Service Current Limit for Safety-Related Batteries

# ASSESSMENT OF LEAD-ACID BATTERY STATE OF CHARGE BY MONITORING FLOAT CHARGING CURRENT

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#### INTRODUCTION

There are two methods for assessing the state of charge of a lead-acid battery discussed in the latest IEEE std. 450[1]. The most common method used in the past has been electrolyte specific gravity (S.G.) measurement readings taken with a hydrometer from one or more cells of the battery. The other method to determine the battery state of charge is the use of a stabilized charging (float) current measured with a sensitive clamp-on ammeter or a suitable shunt and voltmeter. Several changes within the battery user community have now made the use of specific gravity readings very costly in some cases and impossible in others. For example, some users have turned to automatic monitoring systems with remote reporting capabilities to routinely collect battery data. There is only one known monitoring system that has provisions to measure specific gravity. It is still being tested and may not be cost effective for many small battery installations. In addition, some of these installations have valveregulated lead-acid (VRLA) batteries which have no provision for measuring specific gravity. In fact, the electrolyte is immobilized, making the measurement of specific gravity impossible. With the large numbers of VRLA batteries now in service and being sold today, the use of the float current method of assessing state of charge is expected to increase.

In 1988 one user of flooded lead acid batteries in a nuclear plant began to measure float current in addition to S.G. readings. A total of 780 cells were monitored. The results of this experience are summarized in this paper. A review of some of the electrochemistry involved is also presented.

The analysis of the collected data has led to the conclusion that float current monitoring is preferred

over specific gravity readings for assessing the state of charge of a lead-acid battery. Now the problem turns to the availability of cost-effective, accurate provisions for measuring float current. The last part of this paper presents a test instrument design specifically for taking float current readings.

# FIELD DATA/EXPERIENCE SUMMARY

In 1988, one nuclear generating station began taking battery float current readings along with the routine specific gravity readings. Shunts were already installed in the circuits such that the current into or out of the battery could be measured. A portable microvoltmeter was used to take the readings. After consulting the battery manufacturers in 1988, initial ceiling values of 1 ampere and 0.5 ampere were established for the larger station batteries and the smaller diesel generator batteries, respectively. These current values were believed to give reasonable assurance that the batteries were fully charged.

Float current readings were added to the weekly surveillance procedures for 9 batteries consisting of a total of 780 cells. The overall terminal voltage, float current, and corrected specific gravity are summarized in the tables below for batteries S1B, S2A, and DG2A. This data is typical for the other batteries. The nominal 8-hour ampere-hour ratings of the batteries were 2400, 1650, and 340 (410) for batteries S1B, S2A, and DG2A respectively. Batteries S1B and S2A each have 120 lead-calcium cells with 1.215 nominal specific gravity electrolyte. Battery DG2A had 60 lead-antimony cells with 1.215 nominal specific gravity until replaced with 410 ampere-hour lead-calcium cells in April 1992.

#### BATTERY S1B DATA

|          | BATTERY<br>VOLTAGE<br>(Volts) | FLOAT<br>CURRENT<br>(Amps) | CORR.<br>SPEC.<br>GRAV. |
|----------|-------------------------------|----------------------------|-------------------------|
| MINIMUM  | 132.1                         | 0.12                       | 1.205                   |
| AVERAGE  | 134.7                         | 0.43                       | 1.211                   |
| MAXIMUM  | 135.4                         | 0.84                       | 1.227                   |
| STD.DEV. | 0.61                          | 0.14                       | 0.005                   |

#### BATTERY S2A DATA

|          | BATTERY<br>VOLTAGE<br>(Volts) | FLOAT<br>CURRENT<br>(Amps) | CORR.<br>SPEC.<br>GRAV. |
|----------|-------------------------------|----------------------------|-------------------------|
| MINIMUM  | 132.4                         | 0.06                       | 1.198*                  |
| AVERAGE  | 134.5                         | 0.50                       | 1.217                   |
| MAXIMUM  | 140.0                         | 2.2*                       | 1.232                   |
| STD.DEV. | 0.69                          | 0.22                       | 0.004                   |

Note: The values marked with an asterisk (\*) are related to a partial discharge of the battery in July 1992 due to a charger failure.

#### BATTERY DG2A DATA

|          | BATTERY<br>VOLTAGE<br>(Volts) | FLOAT<br>CURRENT<br>(Amps) | CORR.<br>SPEC.<br>GRAV. |
|----------|-------------------------------|----------------------------|-------------------------|
| MINIMUM  | 130.0                         | 0.08                       | 1.206                   |
| AVERAGE  | 131.0                         | 0.25                       | 1.219                   |
| MAXIMUM  | 134.6*                        | 0.48                       | 1.234                   |
| STD.DEV. | 1.29                          | 0.08                       | 0.006                   |

Note: The value marked with an asterisk (\*) is due to the change in float voltage made when the lead-antimony cells were replaced with lead-calcium cells in April 1992

Several observations may be made from an analysis of the detailed data as well as the statistical data tabulated above. The detail data shows very little correlation between the specific gravity readings and the actual state of charge at a given point in time. As

defined in IEEE Std 450[1], the battery is considered charged when the float current has stabilized (no significant change for 3 hours) at the float voltage. This was routinely confirmed during each recharge after load discharge testing on many batteries.

As a way of illustrating the charging cycle, let's look at a typical example. Typical data for the recharge following a performance test for a lead-calcium battery is shown in Figure 1.

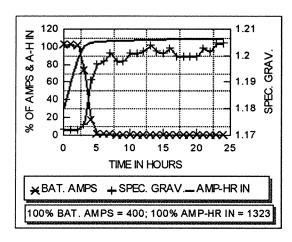


Fig.1 Recharge after Performance Test of Battery S2A

The high initial current(>400A), limited only by the current limit setting of the charger, flows for about 3 hours. There is then a rapid drop in current followed by a transition into a slowly decaying current. Over 100% of the discharge ampere-hours were returned within 3 hours, but it was not until after 17 hours that the charging current stabilized. Notice that the specific gravity reading is only at 1.205 at 24 hours, 7 hours after the charging current has stabilized. This is still 10 points below the normal, full-charge specific gravity of 1.215.

From the example above, it should be clear that charging current responds more quickly than specific gravity readings to changes in the state-of-charge and provides a better indication of a return to full charge.

Given only the "snapshot" weekly pilot-cell readings, a much better assessment of state of charge can be made with float current than with specific gravity. These observations are also supported by the battery system operation review given below. A few key points concerning battery system operation are summarized here. In float operation, the battery, charger, and loads are connected in parallel. The charger normally supplies the loads and the float current into the battery. If the charger output is lost or inadequate to supply the loads, the battery immediately supplies the required current. Normal house loads on the diesel generator and station batteries are in the range of 10 to 100 amperes, respectively. Therefore, on a loss of charger output, the battery current immediately changes direction and increases dramatically, at least by a factor of 10. This discharge current would continue until the charger output is restored or the batteries are fully discharged. If the battery has been discharged and then placed on charge, the battery current will initially increase in the charging direction and remain significantly higher(amps vs milliamps) than normal until the charge has been returned. The relative magnitude and direction of the battery(float) current in conjunction with the battery terminal voltage provides a timely, accurate indication of state-of-charge.

One last observation concerning the float current data should be made. The ceiling value for float current must be selected to allow for the variations expected during normal operation. Since the float current reading will increase dramatically for a partially discharged battery, some cushion above the normal "rated" float current is possible and even desirable. The statistical data shows that the average float current plus 2.5 standard deviations was under the ceiling value on all the batteries. The detailed data from battery S2A taken during the partial discharge also shows that even for partial discharges, the float current increases dramatically to correctly alert the user to possible problems.

# **ELECTROCHEMICAL REACTIONS REVIEW** [2,3,4]

A review of some aspects of the charge and discharge reactions of a lead-acid battery may prove helpful here. The double-sulfate theory is now commonly accepted to describe the basic chemical reactions occurring within a lead-acid cell during charge and discharge. The chemical equation below expresses the overall reactions of this theory.

$$PbO_2 + Pb + H_2SO_4 \Leftrightarrow 2PbSO_4 + 2H_2O \tag{1}$$

Lead dioxide (PbO<sub>2</sub>) and sponge lead (Pb) are the active materials in the positive and negative plates, respectively. The sulfuric acid (H<sub>2</sub>SO<sub>4</sub>) is the electrolyte and the lead sulfate and water are products of the discharge reaction. The discharge reaction goes from left to right and the charge reaction from right to left. Both the plates and the electrolyte are involved in the reaction. Lead sulfate is formed at both the positive and negative plates during discharge and the sulfuric acid is converted in the process.

As noted above, during a discharge, the sulfuric acid is being converted to lead sulfate and water at the plates. The weaker acid from the plates diffuses into the bulk electrolyte, decreasing the specific gravity. While charging, the lead sulfate is converted back to plate active materials and sulfuric acid. It is important to keep in mind that this reaction is occurring in the active materials of the plates, not in the bulk electrolyte. As the acid within the plates becomes more dense, it leaves the plates and diffuses very slowly through the electrolyte raising the specific gravity of the bulk electrolyte to the fullcharge level. Any current in excess of that required to convert the available lead sulfate goes into the electrolysis of water in the electrolyte, thus releasing hydrogen at the negative plates and oxygen at the positive plates. It is this gassing action that helps to mix the electrolyte. Since both discharge and charge reactions involve diffusion of the electrolyte, the state of charge indicated by specific gravity readings inherently lags the actual state of charge of the cell, especially during charge. In a lead-calcium cell, which gasses much less than a lead-antimony cell. the mixing of the electrolyte is much more dependent on diffusion, and the lag in specific gravity readings is more pronounced.

The open circuit voltage of a cell is directly related to the specific gravity of the electrolyte and more specifically to the acid concentration in the active materials of the plates. In a stabilized cell, where the electrolyte is homogeneous, the specific gravity of the bulk electrolyte is the same as that near the plates. The open circuit voltage of a fully charged cell with a nominal specific gravity of 1.215 is approximately 2.06 volts. The voltage of a discharged cell will be lower. As soon as charging starts, sulfuric acid is formed in the plates and the cell voltage rises, opposing the applied charging voltage. Conceptually, this process can be explained by equation (2) below.

$$I = \frac{E - Eb}{R} \tag{2}$$

Where:

I = charging current
E = charging voltage
E<sub>b</sub> = internal cell voltage
R = cell resistance.

The applied voltage "E" is held constant by the charger. The cell voltage "E<sub>b</sub>" is dependent on the concentration of lead ions, divalent and tetravalent, available for reaction. This relationship is expressed in the following equation, which has been derived from the Nernst' equation. See reference [5] or another electrochemistry text for the derivation.

$$E_{i} = 1.87 + 0.029 \log \frac{(Pb + + + +)}{(Pb + +)^{2}}$$
 (3)

The quantities enclosed in parentheses are the number of lead ions available for reaction and are small in number. The source of the tetravalent ions (Pb++++) is the small amount of the lead dioxide that is ionized. The only source of divalent ions is lead sulfate which is produced during discharge as noted above. The amount of lead sulfate within the cell will be at a maximum when the cell is fully discharged and at a minimum when fully charged. Therefore, for a fully discharged cell the cell voltage will be at a minimum when first connected to the charger. The internal cell resistance is a very low value and doesn't change greatly whether the cell is fully charged or discharged, but it will be higher in a fully discharged cell. Referring to equation (2) above, it can be seen that the current will be at a maximum under these conditions for a given charging voltage. The discharged cell continues to charge at or near the maximum current available from the charger until the available lead sulfate is almost exhausted. At this point, the reduction in the supply of divalent ions causes the cell voltage to increase to a value approaching that of the charger. When all the available lead sulfate has been converted, the cell is fully charged and the only current flowing is that required to overcome the self-discharge reactions at the plates and any electrolysis of water caused by the applied voltage. The charging current can be made up of three components used in (1)recharging the cell by converting lead sulfate, (2) overcoming self-discharge by maintaining proper plate potentials, and (3)

releasing gases through electrolysis of water. Obviously, the first component is the most important and, fortunately, it is the preferential chemical reaction as well. The second component only starts after the cell voltage has risen above the open circuit value. The last component is not desirable, but any current in excess of that needed for the first two components is used in this way.

While equation (2) given above is helpful to visualize what is happening in the cell, it does little to quantify the results seen in the voltage and current during charging, especially during float operation. Float operation is more clearly described using Tafel lines as described below.

On float charge, the current flowing through a leadacid cell and the applied voltage are related by its Tafel characteristics. A typical Tafel line graph is shown in Figure 2.

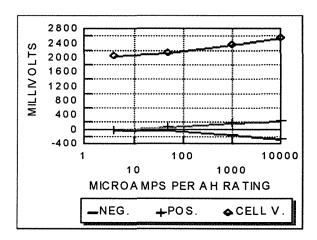


Fig.2 Typical Tafel graph

Each cell type will generally have its own specific graph. These graphs have several lines showing the relationship of the cell voltage to the float current, usually given in microamperes per ampere-hour of 8-hour rating. The positive and negative plate polarization voltages are also shown, but may be ignored for our purposes. Knowing the applied charging voltage and the cell nominal rating in ampere-hours, one can determine the expected float current for a given cell type. The actual installed value of float current varies with temperature and age. Also some allowance must be made for manufacturing tolerances between cells. A portion of

this data is confirmed routinely after the batteries are assembled into strings prior to the factory capacity test. Only the float current and cell voltages are available, but this is all that is needed for our purposes. Using data obtained from the graphs and/or factory records, ceiling values of float(charging) current can be developed for surveillance purposes. The battery vendor can help in selecting these values.

Based on the experience with the use of both methods of determining the state of charge of a battery, we have determined that the charging current method offers several advantages over the specific gravity method. Some of the advantages are listed below.

- Charging <u>current</u> is a more meaningful indicator than specific gravity since <u>current</u> is the primary means of delivering power into and out of the battery.
- Charging current responds more quickly to changes in state-of-charge. In fact, the careful selection of a ceiling current value is very important to allow for normal variations.
- 3. Charging current more closely reflects the condition of the whole battery than the specific gravity of a pilot cell.

In conclusion, two methods of determining the state of charge of a lead-acid battery have been described in some detail. One method of reading charging current has been explained, while the results of several years of using both methods has been presented. Based on the experience gained with the charging current method, the technical background and the general trend within the battery industry, we recommend the use of charging current to determine the state of charge of a lead-acid battery. While it is true that not many battery systems were initially designed with provisions for reading charging current, there are other measurement techniques that would allow the retrofit of those systems. The operation of one such technique is described below.

#### **INSTRUMENT OPERATION**

The float current in a fully charged battery is in the milliamperes range for the more common sizes used in stationary applications. Instruments used to monitor this current must be capable of accurately measuring this small current and also be able to

withstand the maximum battery current without damage.

The shunt and portable voltmeter method may not be practical or even possible for many applications. Although Hall Effect meters will withstand high currents, accurate measurements below a few amperes are difficult to obtain.

In addition to Hall Effect sensors, there are methods of resetting the core of a current transformer and measuring the secondary current immediately after a reset pulse [6,8]. Since, initially the core will be fully reset, the secondary current is directly proportional to the primary current and can be easily measured. With the passage of time the core will be driven into saturation and will lose its transformer characteristics. The reset pulse is applied again and the process is repeated. By using this method measurement of DC current can be easily obtained. However, the range of such a "DC current transformer" is limited by the reset current pulse amplitude and losses in the core. The application of large currents to the primary of such a transformer will not destroy semiconductor devices on the secondary.

The physical core size to be used for float current measurements must be able to accept large conductors carrying full discharge current. Hence the core will be of significant dimensions. Since core losses determine the lower end of current sensing circuitry, it is difficult to obtain reliable results using a "DC" current transformer when the primary current is lower than a few tens of milliamperes.

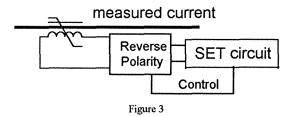


Figure 3 shows the device, operating on the principle of a saturable reactor oscillator, which addresses some of these limitations. The measured current passes through the center of the ferrite core. The winding of the ferrite itself is connected to the core SET circuitry.

The magnetization flux magnitude in the ferrite core is the sum of flux generated by the measured current and the flux of the SET winding on the ferrite.

Consider a case where the measured current is equal to zero. A voltage  $V_L$ , is applied across the SET winding of the core. The current will start to rise with the speed given by the following equation.

$$\frac{di}{dt} = \frac{V_T}{L} \tag{4}$$

where

V<sub>L</sub>= Voltage across Set winding L = Inductance of the Set winding

The magnetic flux in the core will start to rise and after a certain amount of time, ts, will reach the saturation point.

$$ts = \frac{4xAxNx(B_O - B_S)x10^8}{V}$$
 (5)

where:

ts= time required to reach saturation

A= Cross-section of the core[cm<sup>2</sup>]

N = number of turns

V= applied voltage

Bo, Bs = initial and saturation flux density [Gs]

At this point, the current will increase rapidly, an event which can be easily detected by the logic's circuitry.

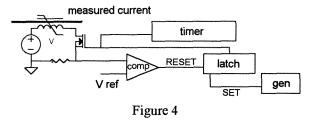
Note that the time to reach saturation (ts) is a function of the initial flux density. Naturally, this implies a simple dependence on sensed DC current. With a constant voltage applied to the set winding, the time required to reach a saturation point will depend on magnitude and direction of the sensed DC current. For example, if the flux produced by the sensed current has the same direction as the flux produced by the SET winding, ts will be shortened.

Of all analog values, time is the one which can be measured the most accurately. With proper sizing of a sensing transformer we can obtain quantized ts values for a wide current range.

A particular problem of this design is the influence of other parameters on ts. In particular, when attempting to measure very small currents, external influences can have a comparatively large influence on ts. Some of the parasitic contributors which we have identified are:

- resistance of the winding and the current loop used to SET the core
- residual magnetic field in the core
- · external magnetic field
- noise in the measured conductor
- temperature

Together, these parasitics significantly deteriorate our signal-to-noise ratio (SNR). Figure 4 presents a technique to reduce the influence of many of the above parasitics.



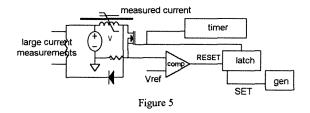
A known DC voltage is applied to the SET windings by a MOSFET switch, with an internal resistance which is very low compared to the total resistance of the SET winding. Once the resulting current reaches a reference value, the MOSFET is turned off, allowing the ferrite core to reset. After a predetermined time (which is not critical for measurements), the MOSFET is turned on again and the process is repeated.

A microprocessor measures the ON time of the MOSFET and calculates an average of many measurements. An average ON time is stored by a microprocessor. Next, the current direction in the SET core is reversed and the process is repeated.

The measuring, averaging and storing process is repeated again. Finally, the difference between the two averaged readings is calculated. This "differential" result is proportional to the current flowing through the sense wire. Note that this differential technique greatly reduces the effects of changes in temperature, voltage and resistance. The only unbalanced influence is the external magnetic quasi-stationary field (eg. earth's magnetic field). The reduction of this error source is possible by placing additional ferrite cores on each side of the measuring core and conducting offset measurements during initial installation. Of course, in most

installations the error contribution from external magnetic fields is negligible. Finally, high frequency and low frequency noise contributions are greatly decreased by use of multiple averaged samples.

It is interesting to note that when the measurement current is increased over certain levels which can be detected by the method described, very small modification will permit detection of a large current flowing through the same core. (Fig. 5)



Now the circuit will work on a different principle. The core will be reset only in the direction opposite to the measured current, and immediately after resetting, the voltage across the burden resistor will be measured. The simple sample and hold amplifier will measure the current during the time immediately preceding the reset pulse, as described in [7].

Furthermore it is also worth observing that the SET pulse present on the secondary of the measuring core will, in fact, inject a much larger current into the battery DC circuit. If the frequency and current of this SET pulse is controlled and voltage measurements across individual cells of the battery are sampled with synchronous frequency, it is possible to use such circuitry not only to measure float and charge current but also internal impedance of individual cells when the battery is on float.

The Polytronics Engineering, BTM3000P battery monitoring instrument based on the above principle is being used as a permanently installed monitoring system on stationary and UPS batteries. This system permits the observation a 1mA float current change on the 500 MCM conductor cable in the presence of the high ripple AC current normally present on UPS battery installations.

#### **REFERENCES**:

[1] IEEE Recommended Practice for Maintenance, Testing, and Replacement of

- Large Lead Storage batteries for Generating Stations and Substations, IEEE Std. 450, 1987
- [2] G. W. Vinal, Storage Batteries, Fourth Edition, New York, John Wiley & Sons, 1955.
- [3] E. A. Hoxie, "Some Charging Characteristics of Lead-Acid Batteries", A.I.E.E. Conference Paper #56-1036
- [4] H. E. Haring and U. B. Thomas, "Electrochemical Behavior of Lead, Lead-Antimony, and Lead-Calcium Cells", Transactions of the Electrochemical Society, Vol. 68, 1935.
- [5] H. J. Creighton, Principles and Applications of Electrochemistry, Vol I, Fourth Edition, New York, John Wiley, & Sons, 1951
- [6] R. Severns, "Improving and Simplifying HF DC Current Sensors", Conference Proceedings of the 1986 IEEE Applied Power Electronics Conference (APEC '86), pp. 180-183, New Orleans, Louisiana, April/May 1986
- [7] C. Sullender, "Magnetic Current Sensors for Space Station Freedom", Conference Proceedings of the 1991 IEEE Applied Power Electronics Conference (APEC '91), pp. 635-641, Dallas, Texas.
- [8] A. Radum and J. Rulison, "An Alternative low-cost current-sensing scheme for highcurrent power electronics circuits", Conference Proceedings of the 1990 IEEE Industry Applications Society Annual Meeting, pp. 619-625, Seattle, Washington, October 1990
- [9] T. Sonoda and R. Ueda, "A Current Sensor of High Response and High Sensitivity", Conference Proceedings of the 1990 IEEE Industry Applications Society Annual Meeting, pp. 626-631, Seattle, Washington, October 1990
- [10] W. A. Geyger, "Dispozitive Magnetice Neliniare", Editura tehnica, Bucuresti, 1968

# **Attachment A**

**Revisions to Revision 3.1 of the ISTS NUREGs** 

(NUREG-1430, -1431, -1432, -1433, and -1434)

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.4 DC Sources - Operating

LCO 3.8.4 The Train A and Train B DC electrical power subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

# **ACTIONS**

| CONDITION                                                                                  |            | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|--------------------------------------------------------------------------------------------|------------|-----------------------------------------------------------------------------------------------------|---------------------|
| A. One [or two] battery charger[s] on one subsystemtrain; inoperable.                      | A.1        | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
|                                                                                            | AND        |                                                                                                     |                     |
|                                                                                            | A.2        | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
|                                                                                            | AND        |                                                                                                     |                     |
|                                                                                            | A.3        | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours 7 days   |
| [ B. One [or two] batter[y][ies on one subsystemtrain] inoperable.                         | B.1        | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours ]         |
| C. One DC electrical power subsystem inoperable for reasons other than Condition A [or B]. | C.1        | Restore DC electrical power subsystem to OPERABLE status.                                           | [2] hours           |
| D. Required Action and Associated Completion                                               | D.1        | Be in MODE 3.                                                                                       | 6 hours             |
| Time not met.                                                                              | <u>AND</u> |                                                                                                     |                     |
|                                                                                            | D.2        | Be in MODE 5.                                                                                       | 36 hours            |

#### 3.8 ELECTRICAL POWER SYSTEMS

#### 3.8.5 DC Sources - Shutdown

LCO 3.8.5

[DC electrical power subsystem shall be OPERABLE to support the DC electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems - Shutdown."]

[One DC electrical power subsystem shall be OPERABLE.]

The second option above applies for plants having a pre-ITS licensing basis (CTS) for electrical power requirements during shutdown conditions that required only one DC electrical power subsystem to be OPERABLE. Action A and the bracketed optional wording in Condition B are also eliminated for this case. The first option above is adopted for plants that have a CTS requiring the same level of DC electrical power subsystem support as is required for power operating conditions.

\_\_\_\_\_

APPLICABILITY: MODES 5 and 6,

During movement of [recently] irradiated fuel assemblies.

| Λ | C | ГΙ  | $\overline{}$ | N  | C             |
|---|---|-----|---------------|----|---------------|
| А |   | יוו | ( )           | IN | $\overline{}$ |

-----NOTE------

LCO 3.0.3 is not applicable.

| CONDITION                                                             |            | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|-----------------------------------------------------------------------|------------|-----------------------------------------------------------------------------------------------------|---------------------|
| [A. One [or two] battery charger[s on one trainsubsystem] inoperable. | A.1        | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
| AND                                                                   | AND        |                                                                                                     |                     |
| The redundant train subsystem battery and charger[s] OPERABLE.        | A.2        | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
| onargorial of ENABLE.                                                 | <u>AND</u> |                                                                                                     |                     |

# ACTIONS (continued)

| CONDITION                                                                                     | REQUIRED ACTION                                                                                                                    | COMPLETION TIME     |
|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|---------------------|
|                                                                                               | A.3 Restore battery charger[s] to OPERABLE status.                                                                                 | [72] hours 7 days ] |
| B. One [or more] required DC electrical power subsystem[s] inoperable [for reasons other than | B.1 Declare affected required feature(s) inoperable.  OR                                                                           | Immediately         |
| Condition A.  OR                                                                              | B.2.1 Suspend CORE ALTERATIONS.                                                                                                    | Immediately         |
| Required Action and                                                                           | <u>AND</u>                                                                                                                         |                     |
| associated Completion<br>Time of Condition A not<br>met].                                     | B.2.2 Suspend movement of [recently] irradiated fuel assemblies.                                                                   | Immediately         |
|                                                                                               | <u>AND</u>                                                                                                                         |                     |
|                                                                                               | B.2.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration. | Immediately         |
|                                                                                               | <u>AND</u>                                                                                                                         |                     |
|                                                                                               | B.2.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status.                                       | Immediately         |

#### 3.8 ELECTRICAL POWER SYSTEMS

#### 3.8.6 Battery Parameters

#### -REVIEWER'S NOTE-

Licensee's must implement a program, as specified in Specification 5.5.17, to monitor battery parameters that is based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead-Acid Batteries For Stationary Applications."

LCO 3.8.6 Battery parameters for the Train A and Train B <u>electrical power</u> subsystem batteries shall be within limits.

Subsystem Datteries Shall be within limits.

APPLICABILITY: When associated DC electrical power subsystems are required to be OPERABLE.

| Λ | C | ГΙ  | $\cap$ | N  | C |
|---|---|-----|--------|----|---|
| А | C | יוו | U      | IN | O |

-----NOTE------

Separate Condition entry is allowed for each battery.

with float current > [2]

amps.

CONDITION REQUIRED ACTION **COMPLETION TIME** A.1 Perform SR 3.8.4.1 A. One [or two] batter[y][ies 2 hours on one trainsubsystem] with one or more battery <u>AND</u> cells float voltage < A.2 [2.07] V. Perform SR 3.8.6.1. 2 hours AND A.3 Restore affected cell 24 hours voltage ≥ [2.07] V. B.1 Perform SR 3.8.4.1. B. One [or two] batter[y][ies 2 hours on one trainsubsystem]

to  $\leq$  [2] amps.

Restore battery float current

[12] hours

AND

B.2

# ACTIONS (continued)

| to Holdo (continuca)                                                                                                                      |                   |                                                                                                       | _               |  |
|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------|-----------------|--|
| CONDITION                                                                                                                                 |                   | REQUIRED ACTION                                                                                       | COMPLETION TIME |  |
| Required Action C.2 shall be completed if electrolyte level was below the top of plates.                                                  | Requir            | red Actions C.1 and C.2 are oplicable if electrolyte level elow the top of plates.                    |                 |  |
| C. One [or two] batter[y][ies on one subsystemtrain] with one or more cells electrolyte level less                                        | C.1<br><u>AND</u> | Restore electrolyte level to above top of plates.                                                     | 8 hours         |  |
| than minimum established design limits.                                                                                                   | C.2               | Verify no evidence of leakage.                                                                        | 12 hours        |  |
|                                                                                                                                           | AND               |                                                                                                       |                 |  |
|                                                                                                                                           | C.3               | Restore electrolyte level to greater than or equal to minimum established design limits.              | 31 days         |  |
| D. One [or two] batter[y][ies on one subsystemtrain] with pilot cell electrolyte temperature less than minimum established design limits. | D.1               | Restore battery pilot cell temperature to greater than or equal to minimum established design limits. | 12 hours        |  |
| E. One or more batteries in redundant subsystems trains with battery parameters not within limits.                                        | E.1               | Restore battery parameters for batteries in one subsystem train to within limits.                     | 2 hours         |  |

# ACTIONS (continued)

|    | CONDITION                                                                                                                               |     | REQUIRED ACTION                        | COMPLETION TIME |
|----|-----------------------------------------------------------------------------------------------------------------------------------------|-----|----------------------------------------|-----------------|
| F. | Required Action and associated Completion Time of Condition A, B, C, D, or E not met.                                                   | F.1 | Declare associated battery inoperable. | Immediately     |
|    | One [or two] batter[y][ies on one subsystemtrain] with one or more battery cells float voltage < [2.07] V and float current > [2] amps. |     |                                        |                 |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                           | FREQUENCY |
|------------|------------------------------------------------------------------------------------------------------------------------|-----------|
| SR 3.8.6.1 | Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. |           |
|            | Verify each battery float current is $\leq$ [2] amps.                                                                  | 7 days    |
| SR 3.8.6.2 | Verify each battery pilot cell $\frac{\text{float}}{\text{voltage}}$ voltage is $\geq$ [2.07] V.                       | 31 days   |
| SR 3.8.6.3 | Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.    | 31 days   |
| SR 3.8.6.4 | Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.              | 31 days   |

# SURVEILLANCE REQUIREMENTS (continued)

|            | SURVEILLANCE                                                                                                                                                                                                                                                                                                                                                                                                                                                    | FREQUENCY                                                                                                                                                                                                                                     |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.5 | Verify each battery connected cell float voltage is $\geq$ [2.07] V.                                                                                                                                                                                                                                                                                                                                                                                            | 92 days                                                                                                                                                                                                                                       |
| SR 3.8.6.6 | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR.  Verify battery capacity is ≥ [80%] of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | 60 months  AND  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity > 100% of |
|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | reached [85]% of the expected life                                                                                                                                                                                                            |

# 5.5 Programs and Manuals

# 5.5.17 <u>Battery Monitoring and Maintenance Program</u>

This Program provides for battery restoration and maintenance, based on [the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer] which includes ing the following:

- a. Actions to restore battery cells with float voltage  $< [2.13] V_{i,7}$  and
- b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the minimum established design limit; and-
- c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.

BWOG STS 5.5-18 Rev. 3.1, 12/01/05

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### BACKGROUND

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment and preferred AC vital bus power (via inverters). As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the recommendations of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The [125/250] VDC electrical power system consists of two independent and redundant safety related Class 1E DC electrical power subsystems ([Train A and Train B]). Each subsystem consists of [two] 125 VDC batteries [(each battery [50]% capacity)], the associated battery charger[s] for each battery, and all the associated control equipment and interconnecting cabling.

[ The 250 VDC source is obtained by use of the two 125 VDC batteries connected in series. Additionally, there is [one] spare battery charger per subsystem, which provides backup service in the event that the preferred battery charger is out of service. If the spare battery charger is substituted for one of the preferred battery chargers, then the requirements of independence and redundancy between subsystems are maintained. ]

During normal operation, the [125/250] VDC load is powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC load is automatically powered from the station batteries.

The [Train A and Train B] DC electrical power subsystems provide the control power for its associated Class 1E AC power load group, [4.16] kV switchgear, and [480] V load centers. The DC electrical power subsystems also provide DC electrical power to the inverters, which in turn power the AC vital buses.

The DC power distribution system is described in more detail in Bases for LCO 3.8.9, "Distributions System - Operating," and for LCO 3.8.10, "Distribution Systems - Shutdown."

# BACKGROUND (continued)

Each 125/250 VDC battery is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystem to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [There is no sharing between redundant Class 1E subsystems, such as batteries, battery chargers, or distribution panels.]

Each battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for Train A and Train B DC electrical power subsystems are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The minimum design voltage limit is [105/210] V.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each Train A and Train B DC electrical power subsystem battery charger has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger also has sufficient excess capacity to restore the battery from the design minimum charge to its fully charged state within [24] hours while supplying normal steady state loads discussed in the FSAR, Chapter [8] (Ref. 4).

# BACKGROUND (continued)

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 5) and Chapter [15] (Ref. 6), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC sources is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining the DC sources OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power and
- b. A worst-case single failure.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

# **LCO**

The DC electrical power subsystems, each subsystem consisting of [two] batteries, battery charger [for each battery] and the corresponding control equipment and interconnecting cabling supplying power to the associated bus within the <a href="train-subsystem">train-subsystem</a> are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any <a href="train-DC">train-DC</a> electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4).

An OPERABLE DC electrical power subsystem requires all required batteries and respective chargers to be operating and connected to the associated DC bus(es).

#### **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure safe unit operation and to ensure that:

- Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients and
- b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 5 and 6 are addressed in the Bases for LCO 3.8.5, "DC Sources - Shutdown."

#### **ACTIONS**

#### A.1, A.2, and A.3

Condition A represents one <u>subsystem train</u> with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

| BA | SE | S |
|----|----|---|
|----|----|---|

#### ACTIONS (continued)

------REVIEWER'S NOTE------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has is now been fully recharged capable of supplying the maximum expected load requirement. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

| BASE | ΞS |
|------|----|
|------|----|

# ACTIONS (continued)

# -----REVIEWER'S NOTE-----

Any licensee wishing to adopt Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications", and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, a 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours days. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hours day Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

# <u>B.1</u>

### ------REVIEWER'S NOTES------

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177 and 1.174, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications."
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one subsystem] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one train subsystem with one [or two] batter[y][ies] inoperable. With one [or two] batter[y][ies] inoperable, the DC bus is being supplied by the OPERABLE battery charger[s]. Any event that

DC Sources - Operating B 3.8.4

results in a loss of the AC bus supporting the battery charger[s] will also result in loss of DC to that <a href="trainsubsystem">trainsubsystem</a>. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[y][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[y][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific Completion Times.

#### ACTIONS (continued)

# <u>C.1</u>

Condition C represents one train-subsystem with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected trainsubsystem. The 2 hour limit is consistent with the allowed time for an inoperable DC distribution subsystem train.

If one of the required DC electrical power subsystems is inoperable for reasons other than Condition A or B (e.g., inoperable battery charger and associated inoperable battery), the remaining DC electrical power subsystem has the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure could, however, result in the loss of <a href="mailto:the-minimum">the-minimum</a> necessary DC electrical subsystems to mitigate a worst case accident, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 7) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

### D.1 and D.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 5 is consistent with the time required in Regulatory Guide 1.93 (Ref. 7).

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.4.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the battery chargers, which support the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life (expected to be approximately 20 years). The 7 day Frequency is consistent with manufacturer recommendations and IEEE 450 (Ref. 8).

#### SR 3.8.4.2

This SR verifies the design capacity of the battery chargers. According to Regulatory Guide 1.32 (Ref. 89), the battery charger supply is recommended to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period if sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the battery service test and will need to be supplemented with additional

# SURVEILLANCE REQUIREMENTS (continued)

loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage, temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is  $\leq$  [2] amps.

The Surveillance Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these [18 month] intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

#### SR 3.8.4.3

A battery service test is a special test of the battery capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length should correspond to the design duty cycle requirements as specified in Reference 4.

The Surveillance Frequency of [18 months] is consistent with the recommendations of Regulatory Guide 1.32 (Ref. <u>89</u>) and Regulatory Guide 1.129 (Ref. <u>910</u>), which state that the battery service test should be performed during refueling operations, or at some other outage, with intervals between tests not to exceed [18 months].

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test.

The reason for Note 2 is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated

#### SURVEILLANCE REQUIREMENTS (continued)

independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned event that satisfy this SR.

#### REFERENCES

- 1. 10 CFR 50, Appendix A, GDC 17.
- 2. Regulatory Guide 1.6, March 10, 1971.
- 3. IEEE-308-[1978].
- 4. FSAR, Chapter [8].
- 5. FSAR, Chapter [6].
- 6. FSAR, Chapter [15].
- 7. Regulatory Guide 1.93, December 1974.
- 8. IEEE-450-[1995].
- 89. Regulatory Guide 1.32, February 1977.
- 910. Regulatory Guide 1.129, December 1974.

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#### B 3.8 ELECTRICAL POWER SYSTEMS

#### B 3.8.5 DC Sources - Shutdown

#### **BASES**

#### **BACKGROUND**

A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating."

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [15] (Ref. 2), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum DC electrical power sources during MODES 5 and 6 and during movement of [recently] irradiated fuel assemblies ensures that:

- a. The unit can be maintained in the shutdown or refueling condition for
- b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status, and
- c. Adequate DC electrical power is provided to mitigate events postulated during shutdown, such as a fuel handling accident [involving handling recently irradiated fuel. Due to radioactive decay, DC electrical power is only required to mitigate fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)].

In general, when the unit is shut down, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many DBAs that are analyzed in MODES [1, 2, 3, and 4] have no specific analyses in

# APPLICABLE SAFETY ANALYSES (continued)

MODES [5 and 6] because the energy contained within the reactor pressure boundary, reactor coolant temperature and pressure, and the corresponding stresses result in the probabilities of occurrence being significantly reduced or eliminated, and in minimal consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

The shutdown Technical Specification requirements are designed to ensure that the unit has the capability to mitigate the consequences of certain postulated accidents. Worst case DBAs which are analyzed for operating MODES are generally viewed not to be a significant concern during shutdown MODES due to the lower energies involved. The Technical Specifications therefore require a lesser complement of electrical equipment to be available during shutdown than is required during operating MODES. More recent work completed on the potential risks associated with shutdown, however, have found significant risk associated with certain shutdown evolutions. As a result, in addition to the requirements established in the Technical Specifications, the industry has adopted NUMARC 91-06, "Guidelines for Industry Actions to Assess Shutdown Management," as an Industry initiative to manage shutdown tasks and associated electrical support to maintain risk at an acceptable low level. This may require the availability of additional equipment beyond that required by the shutdown Technical Specifications.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO

The DC electrical power subsystems, [each required] [the required] subsystem consisting of two batteries, one battery charger per battery, and the corresponding control equipment and interconnecting cabling within the <a href="mailto:trainsubsystem">trainsubsystem</a>, [are] [is] required to be OPERABLE to support [required] [one] <a href="mailto:trainsubsystem">trainsubsystem</a>[s] of the distribution systems [required OPERABLE by LCO 3.8.10, "Distribution Systems - Shutdown."] This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents [involving handling recently irradiated fuel]).

#### **APPLICABILITY**

The DC electrical power sources required to be OPERABLE in MODES 5 and 6 and during movement of [recently] irradiated fuel assemblies, provide assurance that:

- Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core,
- Required features needed to mitigate a fuel handling accident [involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)] are available,
- c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available, and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.4.

#### **ACTIONS**

LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, 3, or 4 would require the unit to be shutdown unnecessarily.

#### A.1, A.2, and A.3

------REVIEWER'S NOTE------

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both trainsubsystems of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one trainsubsystem of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as ACTION A.

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# ACTIONS (continued)

Condition A represents one trainsubsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

# ------REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

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A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting modes, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit modes that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

# ACTIONS (continued)

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

### -----REVIEWER'S NOTE-----

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours days. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hours day Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

#### B.1, B.2.1, B.2.2, B.2.3, and B.2.4

[If two trainsubsystems are required by LCO 3.8.10, the remaining trainsubsystem with DC power available may be capable of supporting sufficient systems to allow continuation of CORE ALTERATIONS and [recently] irradiated fuel movement]. By allowing the option to declare required features inoperable with the associated DC power source(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO ACTIONS. In many instances this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend

CORE ALTERATIONS, movement of [recently] irradiated fuel assemblies, and operations involving positive reactivity additions that could result in

# ACTIONS (continued)

loss of required SDM (MODE 5) or boron concentration (MODE 6).] Suspending positive reactivity additions that could result in failure to meet the minimum SDM or boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that what would be required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystem[s] and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.3. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

#### **REFERENCES**

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [15].

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

#### B 3.8.6 Battery Parameters

#### **BASES**

#### **BACKGROUND**

This LCO delineates the limits on battery float current as well as electrolyte temperature, level, and float voltage for the DC power subsystem batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown." In addition to the limitations of this Specification, the [licensee controlled program] also implements a program specified in Specification 5.5.17 for monitoring various battery parameters—that is based on the recommendations of IEEE Standard 450–1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead-Acid Batteries For Stationary Applications" (Ref. 1).

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 3) and Chapter [15] (Ref. 4), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one <a href="trainsubsystem">trainsubsystem</a> of DC sources OPERABLE during accident conditions, in the event of:

# APPLICABLE SAFETY ANALYSES (continued)

- a. An assumed loss of all offsite AC power or all onsite AC power and
- b. A worst-case single failure.

Battery parameters satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

#### LCO

Battery parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Battery parameter limits are conservatively established, allowing continued DC electrical system function even with limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.17.

#### **APPLICABILITY**

The battery parameters are required solely for the support of the associated DC electrical power subsystems. Therefore, battery parameter limits are only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.4 and LCO 3.8.5.

#### **ACTIONS**

# A.1, A.2, and A.3

With one or more cells in one or more batteries in one trainsubsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

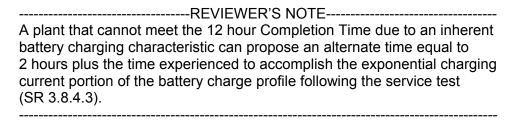
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#### ACTIONS (continued)

#### B.1 and B.2

One or more batteries in one trainsubsystem with float current > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "<u>OR</u>" statement in Condition F is applicable and the battery must be declared inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action B.2) from any discharge that might have occurred due to a temporary loss of the battery charger.



#### ACTIONS (continued)

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

#### C.1, C.2, and C.3

With one or more batteries in one trainsubsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.17, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.17.b item to initiate action to equalize and test in accordance with manufacturer's recommendation are taken from Annex D of IEEE Standard 450-1995. They are performed following the restoration of the electrolyte level to above the top of the plates. Based on the results of the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

#### ACTIONS (continued)

#### <u>D.1</u>

With one or more batteries in one trainsubsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

# <u>E.1</u>

With one or more batteries in redundant trainsubsystems with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one trainsubsystem within 2 hours.

# <u>F.1</u>

With one or more batteries with any battery parameter outside the allowances of the Required Actions for Condition A, B, C, D, or E, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding battery must be declared inoperable. Additionally, discovering one or more batteries in one <a href="trainsubsystem">trainsubsystem</a> with one or more battery cells float voltage less than [2.07] V and float current greater than [2] amps indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately.

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The float current requirements are based on the float current indicative of a charged battery. Use of float current to determine the state of charge of the battery is consistent with IEEE-450 (Ref. 1). The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

#### SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge, which could eventually render the battery inoperable. Float voltages in this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.17. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The Frequency is consistent with IEEE-450 (Ref. 1).

# SURVEILLANCE REQUIREMENTS (continued)

#### SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provide the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

# SURVEILLANCE REQUIREMENTS (continued)

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's ratings. Degradation is indicated, according to IEEE-450 (Ref. 1), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is  $\geq$  [10%] below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned events that satisfy this SR.

# REFERENCES 1. IEEE-450-[1995]. 2. FSAR, Chapter [8]. 3. FSAR, Chapter [6]. 4. FSAR, Chapter [15]. 5. IEEE-485-[1983], June 1983.

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.4 DC Sources - Operating

LCO 3.8.4 The Train A and Train B DC electrical power subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

# **ACTIONS**

| CONDITION                                                                                  |            | REQUIRED ACTION                                                                                     | COMPLETION TIME                |
|--------------------------------------------------------------------------------------------|------------|-----------------------------------------------------------------------------------------------------|--------------------------------|
| A. One [or two] battery charger[s] on one trainsubsystem; inoperable.                      | A.1        | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours                        |
|                                                                                            | <u>AND</u> |                                                                                                     |                                |
|                                                                                            | A.2        | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours            |
|                                                                                            | <u>AND</u> |                                                                                                     |                                |
|                                                                                            | A.3        | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours <mark>7 days</mark> |
| [B. One [or two] batter[y][ies on one trainsubsystem] inoperable.                          | B.1        | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours ]                    |
| C. One DC electrical power subsystem inoperable for reasons other than Condition A [or B]. | C.1        | Restore DC electrical power subsystem to OPERABLE status.                                           | [2] hours                      |
| D. Required Action and Associated Completion                                               | D.1        | Be in MODE 3.                                                                                       | 6 hours                        |
| Time not met.                                                                              | <u>AND</u> |                                                                                                     |                                |
|                                                                                            | D.2        | Be in MODE 5.                                                                                       | 36 hours                       |

#### 3.8 ELECTRICAL POWER SYSTEMS

#### 3.8.5 DC Sources - Shutdown

LCO 3.8.5

[DC electrical power subsystem shall be OPERABLE to support the DC electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems - Shutdown."]

[One DC electrical power subsystem shall be OPERABLE.]

This second option above applies for plants having a pre-ITS licensing basis (CTS) for electrical power requirements during shutdown conditions that required only one DC electrical power subsystem to be OPERABLE. Action A the bracketed optional wording in Condition B are also eliminated for this case. The first option above is adopted for plants that have a CTS requiring the same level of DC electrical power subsystem support as is required for power operating conditions.

.....

APPLICABILITY: MODES 5 and 6,

During movement of [recently] irradiated fuel assemblies.

| Α | C | П | U | N | S |
|---|---|---|---|---|---|
|   |   |   |   |   |   |

-----NOTE------

LCO 3.0.3 is not applicable.

| CONDITION                                                             |     | REQUIRED ACTION                                                                                     | COMPLETION TIME     |  |
|-----------------------------------------------------------------------|-----|-----------------------------------------------------------------------------------------------------|---------------------|--|
| [A. One [or two] battery charger[s on one trainsubsystem] inoperable. | A.1 | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |  |
| AND                                                                   | AND |                                                                                                     |                     |  |
| The redundant train subsystem battery and charger[s] OPERABLE.        | A.2 | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |  |
| ondigotoj of Etable.                                                  | AND |                                                                                                     |                     |  |

# ACTIONS (continued)

| CONDITION                                                                                     | REQUIRED ACTION                                                                                                                    | COMPLETION TIME     |
|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|---------------------|
|                                                                                               | A.3 Restore battery charger[s] to OPERABLE status.                                                                                 | [72] hours 7 days ] |
| B. One [or more] required DC electrical power subsystem[s] inoperable [for reasons other than | B.1 Declare affected required feature(s) inoperable.  OR                                                                           | Immediately         |
| Condition A.  OR                                                                              | B.2.1 Suspend CORE ALTERATIONS.                                                                                                    | Immediately         |
| Required Actions and                                                                          | <u>AND</u>                                                                                                                         |                     |
| associated Completion<br>Time of Condition A not<br>met].                                     | B.2.2 Suspend movement of [recently] irradiated fuel assemblies.                                                                   | Immediately         |
|                                                                                               | <u>AND</u>                                                                                                                         |                     |
|                                                                                               | B.2.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration. | Immediately         |
|                                                                                               | <u>AND</u>                                                                                                                         |                     |
|                                                                                               | B.2.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status.                                       | Immediately         |

#### 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.6 Battery Parameters

# --REVIEWER'S NOTE-

Licensees must implement a program, as specified in Specification 5.5.17, to monitor battery parameters that is based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead-Acid Batteries For Stationary Applications."

LCO 3.8.6 Battery parameters for Train A and Train B <u>electrical power subsystem</u> batteries shall be within limits.

APPLICABILITY: When associated DC electrical power subsystems are required to be OPERABLE.

ACTIONS

-----NOTE------

Separate Condition entry is allowed for each battery.

| CONDITION                                                                     |                   | REQUIRED ACTION                              | COMPLETION TIME |   |
|-------------------------------------------------------------------------------|-------------------|----------------------------------------------|-----------------|---|
| A. One [or two] batter[y][ies on one subsystemtrain] with one or more battery | A.1<br><u>AND</u> | Perform SR 3.8.4.1.                          | 2 hours         |   |
| cells float voltage < [2.07] V.                                               | A.2<br><u>AND</u> | Perform SR 3.8.6.1.                          | 2 hours         |   |
|                                                                               | A.3               | Restore affected cell voltage ≥ [2.07] V.    | 24 hours        |   |
| B. One [or two] batter[y][ies on one subsystemtrain] with float current > [2] | B.1<br><u>AND</u> | Perform SR 3.8.4.1.                          | 2 hours         |   |
| amps.                                                                         | B.2               | Restore battery float current to ≤ [2] amps. | [12] hours      | - |

# ACTIONS (continued)

| CONDITION                                                                                                                                 | REQUIRED ACTION                                                                                                            | COMPLETION TIME |
|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|-----------------|
| Required Action C.2 shall be completed if electrolyte level was below the top of plates.                                                  | Required Actions C.1 and C.2 are only applicable if electrolyte level was below the top of plates.                         |                 |
| C. One [or two] batter[y][ies on one subsystemtrain] with one or more cells electrolyte level less                                        | C.1 Restore electrolyte level to above top of plates.  AND                                                                 | 8 hours         |
| than minimum established design limits.                                                                                                   | C.2 Verify no evidence of leakage.                                                                                         | 12 hours        |
|                                                                                                                                           | AND                                                                                                                        |                 |
|                                                                                                                                           | C.3 Restore electrolyte level to greater than or equal to minimum established design limits.                               | 31 days         |
| D. One [or two] batter[y][ies on one subsystemtrain] with pilot cell electrolyte temperature less than minimum established design limits. | D.1 Restore battery pilot cell temperature to greater than or equal to minimum established design limits.                  | 12 hours        |
| E. One or more batteries in redundant subsystemstrains with battery parameters not within limits.                                         | E.1 Restore battery parameters for batteries in one <a href="subsystem train"><u>subsystem train</u></a> to within limits. | 2 hours         |

# ACTIONS (continued)

|                                                                                                                                                                                                                                       | COMPLETION TIME |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--|
| F. Required Action and associated Completion Time of Condition A, B, C, D, or E not met.  OR  One [or two] batter[y][ies on one subsystemtrain] with one or more battery cells float voltage < [2.07] V and float current > [2] amps. | Immediately     |  |

# SURVEILLANCE REQUIREMENTS

|            | FREQUENCY                                                                                                              |         |
|------------|------------------------------------------------------------------------------------------------------------------------|---------|
| SR 3.8.6.1 | Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. |         |
|            | Verify each battery float current is ≤ [2] amps.                                                                       | 7 days  |
| SR 3.8.6.2 | Verify each battery pilot cell <u>float</u> voltage is ≥ [2.07]<br>V.                                                  | 31 days |
| SR 3.8.6.3 | Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.    | 31 days |
| SR 3.8.6.4 | Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.              | 31 days |

# SURVEILLANCE REQUIREMENTS (continued)

|            | SURVEILLANCE                                                                                                                                                                                                                                                                                                                                                                                                                                                    | FREQUENCY                                                                                                                                                                                                                                                    |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.5 | Verify each battery connected cell <u>float</u> voltage is ≥ [2.07] V.                                                                                                                                                                                                                                                                                                                                                                                          | 92 days                                                                                                                                                                                                                                                      |
| SR 3.8.6.6 | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR.  Verify battery capacity is ≥ [80%] of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | 60 months  AND  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's |

# 5.5 Programs and Manuals

# 5.5.16 <u>Containment Leakage Rate Testing Program</u> (continued)

- Containment leakage rate acceptance criterion is ≤ 1.0 L<sub>a</sub>. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are < 0.60 L<sub>a</sub> for the Type B and C tests and [< 0.75 L<sub>a</sub> for Option A Type A tests] [≤ 0.75 L<sub>a</sub> for Option B Type A tests].
- 2. Air lock testing acceptance criteria are:
  - a) Overall air lock leakage rate is  $\leq [0.05 L_a]$  when tested at  $\geq P_a$ .
  - For each door, leakage rate is ≤ [0.01 L<sub>a</sub>] when pressurized to [≥ 10 psig].
- e. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.
- f. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

# 5.5.17 <u>Battery Monitoring and Maintenance Program</u>

This Program provides for battery restoration and maintenance, based on [the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer] which includes ing the following:

- Actions to restore battery cells with float voltage < [2.13] V; and</li>
- b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the minimum established design limit; and-
- c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### **BACKGROUND**

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment and preferred AC vital bus power (via inverters). As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the recommendations of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The [125/250] VDC electrical power system consists of two independent and redundant safety related Class 1E DC electrical power subsystems ([Train A and Train B]). Each subsystem consists of [two] 125 VDC batteries [(each battery [50]% capacity)], the associated battery charger(s) for each battery, and all the associated control equipment and interconnecting cabling.

[ The 250 VDC source is obtained by use of the two 125 VDC batteries connected in series. Additionally there is [one] spare battery charger per subsystem, which provides backup service in the event that the preferred battery charger is out of service. If the spare battery charger is substituted for one of the preferred battery chargers, then the requirements of independence and redundancy between subsystems are maintained. ]

During normal operation, the [125/250] VDC load is powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC load is automatically powered from the station batteries.

The [Train A and Train B] DC electrical power subsystems provide the control power for its associated Class 1E AC power load group, [4.16] kV switchgear, and [480] V load centers. The DC electrical power subsystems also provide DC electrical power to the inverters, which in turn power the AC vital buses.

The DC power distribution system is described in more detail in Bases for LCO 3.8.9, "Distribution System - Operating," and LCO 3.8.10, "Distribution Systems - Shutdown."

# BACKGROUND (continued)

Each 125/250 VDC battery is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystem to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [There is no sharing between redundant Class 1E subsystems, such as batteries, battery chargers, or distribution panels.]

Each battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for Train A and Train B DC electrical power subsystems are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The minimum design voltage limit is [105/210] V.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each Train A and Train B DC electrical power subsystem battery charger has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger also has sufficient excess capacity to restore the battery from the design minimum charge to its fully charged state within [24] hours while supplying normal steady state loads discussed in the FSAR, Chapter [8] (Ref. 4).

# BACKGROUND (continued)

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 5) and Chapter [15] (Ref. 6), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC sources is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining the DC sources OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power and
- b. A worst-case single failure.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

# **LCO**

The DC electrical power subsystems, each subsystem consisting of [two] batteries, battery charger [for each battery] and the corresponding control equipment and interconnecting cabling supplying power to the associated bus within the <a href="train-subsystem">train-subsystem</a> are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any <a href="train-DC">train-DC</a> electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4).

An OPERABLE DC electrical power subsystem requires all required batteries and respective chargers to be operating and connected to the associated DC bus(es).

#### **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure safe unit operation and to ensure that:

- Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients and
- b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 5 and 6 are addressed in the Bases for LCO 3.8.5, "DC Sources - Shutdown."

#### **ACTIONS**

#### A.1, A.2, and A.3

Condition A represents one train-subsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

| В | Α | S | Ε | S |
|---|---|---|---|---|
|   |   |   |   |   |

#### ACTIONS (continued)

-----REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

\_\_\_\_\_

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it <a href="https://has-is.nowbeen-fully-recharged\_capable\_of\_supplying the maximum expected load\_requirement">https://has-is.nowbeen-fully-recharged\_capable\_of\_supplying the maximum expected load\_requirement</a>. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

#### ACTIONS (continued)

# -----REVIEWER'S NOTE-----

Any licensee wishing to adopt Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications", and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, a 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hoursdays. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour-day Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

# <u>B.1</u>

#### ------REVIEWER'S NOTES------

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177 and RG 1.174., "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications."
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one subsystem] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one train subsytem with one [or two] batter[y][ies] inoperable. With one [or two] batter[y][ies] inoperable, the DC bus is

DC Sources - Operating B 3.8.4

being supplied by the OPERABLE battery charger[s]. Any event that results in a loss of the AC bus supporting the battery charger[s] will also result in loss of DC to that trainsubsystem. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[y][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[y][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific Completion Times.

#### ACTIONS (continued)

# <u>C.1</u>

Condition C represents one train\_subsystem with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected trainsubsystem. The 2 hour limit is consistent with the allowed time for an inoperable DC distribution subsystem-train.

If one of the required DC electrical power subsystems is inoperable for reasons other than Condition A or B (e.g., inoperable battery charger and associated inoperable battery), the remaining DC electrical power subsystem has the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst- case single failure could, however, result in the loss of <a href="mailto:the-minimum">the-minimum</a> necessary DC electrical subsystems to mitigate a worst case accident, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 7) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

#### D.1 and D.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 5 is consistent with the time required in Regulatory Guide 1.93 (Ref. 7).

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.4.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the battery chargers, which support the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life (expected to be approximately 20 years). The 7 day Frequency is consistent with manufacturer recommendations and IEEE 450 (Ref. 8).

#### SR 3.8.4.2

This SR verifies the design capacity of the battery chargers. According to Regulatory Guide 1.32 (Ref. 89), the battery charger supply is recommended to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period is sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the

# SURVEILLANCE REQUIREMENTS (continued)

battery service test and will need to be supplemented with additional loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage, temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is  $\leq$  [2] amps.

The Surveillance Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these [18 month] intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

#### SR 3.8.4.3

A battery service test is a special test of the battery capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length should correspond to the design duty cycle requirements as specified in Reference 4.

The Surveillance Frequency of [18 months] is consistent with the recommendations of Regulatory Guide 1.32 (Ref. 89) and Regulatory Guide 1.129 (Ref. 910), which state that the battery service test should be performed during refueling operations, or at some other outage, with intervals between tests not to exceed [18 months].

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test.

The reason for Note 2 is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial

# SURVEILLANCE REQUIREMENTS (continued)

Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned events that satisfy this SR.

#### **REFERENCES**

- 1. 10 CFR 50, Appendix A, GDC 17.
- 2. Regulatory Guide 1.6, March 10, 1971.
- 3. IEEE-308-[1978].
- 4. FSAR, Chapter [8].
- 5. FSAR, Chapter [6].
- 6. FSAR, Chapter [15].
- 7. Regulatory Guide 1.93, December 1974.
- 8. IEEE-450-[1995].
- 89. Regulatory Guide 1.32, February 1977.
- 910. Regulatory Guide 1.129, December 1974.

#### B 3.8 ELECTRICAL POWER SYSTEMS

#### B 3.8.5 DC Sources - Shutdown

#### **BASES**

#### **BACKGROUND**

A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating."

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [15] (Ref. 2), assume that Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum DC electrical power sources during MODES 5 and 6 and during movement of [recently] irradiated fuel assemblies ensures that:

- a. The unit can be maintained in the shutdown or refueling condition for extended periods,
- b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status, and
- c. Adequate DC electrical power is provided to mitigate events postulated during shutdown, such as a fuel handling accident [involving handling recently irradiated fuel. Due to radioactive decay, DC electrical power is only required to mitigate fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)].

In general, when the unit is shut down, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many DBAs that are analyzed in MODES [1, 2, 3, and 4] have no specific analyses in MODES [5 and 6] because the energy contained within the reactor pressure

# BACKGROUND (continued)

boundary, reactor coolant temperature and pressure, and the corresponding stresses result in the probabilities of occurrence being significantly reduced or eliminated, and in minimal consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

The shutdown Technical Specification requirements are designed to ensure that the unit has the capability to mitigate the consequences of certain postulated accidents. Worst case DBAs which are analyzed for operating MODES are generally viewed not to be a significant concern during shutdown MODES due to the lower energies involved. The Technical Specifications therefore require a lesser complement of electrical equipment to be available during shutdown than is required during operating MODES. More recent work completed on the potential risks associated with shutdown, however, have found significant risk associated with certain shutdown evolutions. As a result, in addition to the requirements established in the Technical Specifications, the industry has adopted NUMARC 91-06, "Guidelines for Industry Actions to Assess Shutdown Management," as an Industry initiative to manage shutdown tasks and associated electrical support to maintain risk at an acceptable low level. This may require the availability of additional equipment beyond that required by the shutdown Technical Specifications.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

**LCO** 

The DC electrical power subsystems, [each required ] [the required] [subsystem consisting of two batteries, one battery charger per battery, and the corresponding control equipment and interconnecting cabling within the <a href="trainsubsystem">trainsubsystem</a>, [are] [is] required to be OPERABLE to support [required] [one] <a href="trainsubsystem">trainsubsystem</a>[s] of the distribution systems [required OPERABLE by LCO 3.8.10, "Distribution Systems - Shutdown."] This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents [involving handling recently irradiated fuel]).

#### **APPLICABILITY**

The DC electrical power sources required to be OPERABLE in MODES 5 and 6, and during movement of [recently] irradiated fuel assemblies, provide assurance that:

- a. Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core,
- Required features needed to mitigate a fuel handling accident [involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)] are available,
- c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available, and
- Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.4.

#### **ACTIONS**

LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, 3, or 4 would require the unit to be shutdown unnecessarily.

#### A.1, A.2, and A.3

ACTION A.

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both trainsubsystems of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one trainsubsystems of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as

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#### ACTIONS (continued)

Condition A represents one trainsubsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging

current portion of the battery charge profile following the service test

(SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

#### ACTIONS (continued)

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

#### -----REVIEWER'S NOTE------

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hour-days. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour-day Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

#### B.1, B.2.1, B.2.2, B.2.3, and B.2.4

[If two trainsubsystems are required by LCO 3.8.10, the remaining trainsubsystem with DC power available may be capable of supporting sufficient systems to allow continuation of CORE ALTERATIONS and [recently] irradiated fuel movement]. By allowing the option to declare required features inoperable with the associated DC power source(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO ACTIONS. In many instances this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend

DC Sources - Shutdown B 3.8.5

CORE ALTERATIONS, movement of [recently] irradiated fuel assemblies, and operations involving positive reactivity additions) that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6). Suspending positive reactivity additions that could result in failure to meet

# ACTIONS (continued)

the minimum SDM or boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that what would be required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystem[s] and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.3. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

# **REFERENCES**

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [15].

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.6 Battery Parameters

#### **BASES**

#### **BACKGROUND**

This LCO delineates the limits on battery float current as well as electrolyte temperature, level, and float voltage for the DC power subsystem batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown." In addition to the limitations of this Specification, the [licensee controlled program] also implements a program specified in Specification 5.5.17 for monitoring various battery parameters that is based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead-Acid Batteries For Stationary Applications" (Ref. 1).

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 3) and Chapter [15] (Ref. 4), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one <a href="trainsubsystem">trainsubsystem</a> of DC sources OPERABLE during accident conditions, in the event of:

#### APPLICABLE SAFETY ANALYSES (continued)

- a. An assumed loss of all offsite AC power or all onsite AC power and
- b. A worst-case single failure.

Battery parameters satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

#### LCO

Battery parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Battery parameter limits are conservatively established, allowing continued DC electrical system function even with limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.17.

#### **APPLICABILITY**

The battery parameters are required solely for the support of the associated DC electrical power subsystems. Therefore, battery parameter limits are only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.4 and LCO 3.8.5.

#### **ACTIONS**

# A.1, A.2, and A.3

With one or more cells in one or more batteries in one trainsubsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

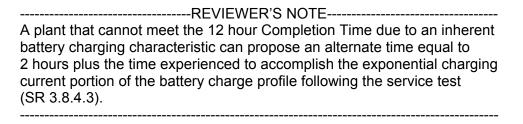
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#### ACTIONS (continued)

#### B.1 and B.2

One or more batteries in one trainsubsystem with float current > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "OR" statement in Condition F is applicable and the battery must be declared inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action B.2) from any discharge that might have occurred due to a temporary loss of the battery charger.



# ACTIONS (continued)

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

### C.1, C.2, and C.3

With one or more batteries in one trainsubsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.17, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.17.b item to initiate action to equalize and test in accordance with manufacturer's recommendation are taken from Annex D of IEEE Standard 450-1995. They are performed following the restoration of the electrolyte level to above the top of the plates. Based on the results of the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

# ACTIONS (continued)

# <u>D.1</u>

With one or more batteries in one trainsubsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

# <u>E.1</u>

With one or more batteries in redundant trainsubsystems with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one trainsubsystem within 2 hours.

# F.1

With one or more batteries with any battery parameter outside the allowances of the Required Actions for Condition A, B, C, D, or E, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding battery must be declared inoperable. Additionally, discovering one or more batteries in one <a href="trainsubsystem">trainsubsystem</a> with one or more battery cells float voltage less than [2.07] V and float current greater than [2] amps indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately.

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The float current requirements are based on the float current indicative of a charged battery. Use of float current to determine the state of charge of the battery is consistent with IEEE-450 (Ref. 1). The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

#### SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge, which could eventually render the battery inoperable. Float voltages in this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.17. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

### SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The Frequency is consistent with IEEE-450 (Ref. 1).

# SURVEILLANCE REQUIREMENTS (continued)

# SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provide the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

### SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

# SURVEILLANCE REQUIREMENTS (continued)

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's ratings. Degradation is indicated, according to IEEE-450 (Ref. 1), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is  $\geq$  [10%] below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned events that satisfy this SR.

| BAOLO      |                                  |  |
|------------|----------------------------------|--|
| REFERENCES | 1. IEEE-450- <del>[1995]</del> . |  |
|            | 2. FSAR, Chapter 8.              |  |
|            | 3. FSAR, Chapter [6].            |  |
|            | 4. FSAR, Chapter [15].           |  |
|            | 5. IEEE-485-[1983], June 1983.   |  |

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.4 DC Sources - Operating

LCO 3.8.4 The Train A and Train B DC electrical power subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

# **ACTIONS**

| CONDITION                                                                                  |            | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|--------------------------------------------------------------------------------------------|------------|-----------------------------------------------------------------------------------------------------|---------------------|
| A. One [or two] battery charger[s] on one subsystemtrain; inoperable.                      | A.1        | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
|                                                                                            | AND        |                                                                                                     |                     |
|                                                                                            | A.2        | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
|                                                                                            | AND        |                                                                                                     |                     |
|                                                                                            | A.3        | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours 7 days   |
| B. One [or two] batter[y][ies on one trainsubsystem] inoperable.                           | B.1        | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours]          |
| C. One DC electrical power subsystem inoperable for reasons other than Condition A [or B]. | C.1        | Restore DC electrical power subsystem to OPERABLE status.                                           | [2] hours           |
| D. Required Action and Associated Completion                                               | D.1        | Be in MODE 3.                                                                                       | 6 hours             |
| Time not met.                                                                              | <u>AND</u> |                                                                                                     |                     |
|                                                                                            | D.2        | Be in MODE 5.                                                                                       | 36 hours            |

3.8.5

#### 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.5 DC Sources - Shutdown

LCO 3.8.5

[DC electrical power subsystem shall be OPERABLE to support the DC electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems - Shutdown."]

[One DC electrical power subsystem shall be OPERABLE.]

This second option above applies for plants having a pre-ITS licensing basis (CTS) for electrical power requirements during shutdown conditions that required only one DC electrical power subsystem to be OPERABLE. Action A and the bracketed optional wording in Condition B are also eliminated for this case. The first option above is adopted for plants that have a CTS requiring the same level of DC electrical power subsystem support as is required for power operating conditions.

\_\_\_\_\_

APPLICABILITY: MODES 5 and 6,

During movement of [recently] irradiated fuel assemblies.

| Α | C | ı | IO | N | S |
|---|---|---|----|---|---|
|   |   |   |    |   |   |

-----NOTE------

LCO 3.0.3 is not applicable.

| CONDITION                                                              |     | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|------------------------------------------------------------------------|-----|-----------------------------------------------------------------------------------------------------|---------------------|
| [ A. One [or two] battery charger[s on one trainsubsystem] inoperable. | A.1 | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
| AND                                                                    | AND |                                                                                                     |                     |
| The redundant train subsystem battery and charger[s] OPERABLE.         | A.2 | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
| onargorial of ENABLE.                                                  | AND |                                                                                                     |                     |

# ACTIONS (continued)

| CONDITION                                                                                     | REQUIRED ACTION                                                                                                                    | COMPLETION TIME     |
|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|---------------------|
|                                                                                               | A.3 Restore battery charger[s] to OPERABLE status.                                                                                 | [72] hours 7 days ] |
| B. One [or more] required DC electrical power subsystem[s] inoperable [for reasons other than | B.1 Declare affected required feature(s) inoperable.  OR                                                                           | Immediately         |
| Condition A.  OR                                                                              | B.2.1 Suspend CORE ALTERATIONS.                                                                                                    | Immediately         |
| Required Action and                                                                           | <u>AND</u>                                                                                                                         |                     |
| associated Completion<br>Time of Condition A not<br>met].                                     | B.2.2 Suspend movement of [recently] irradiated fuel assemblies.                                                                   | Immediately         |
|                                                                                               | <u>AND</u>                                                                                                                         |                     |
|                                                                                               | B.2.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration. | Immediately         |
|                                                                                               | <u>AND</u>                                                                                                                         |                     |
|                                                                                               | B.2.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status.                                       | Immediately         |

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.6 Battery Parameters

# --REVIEWER'S NOTE-

Licensees must implement a program, as specified in Specification 5.5.17, to monitor battery parameters that is based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead-Acid Batteries For Stationary Applications."

LCO 3.8.6 Battery parameters for the Train A and Train B <u>electrical power</u> <u>subsystem</u> batteries shall be within limits.

APPLICABILITY: When associated DC electrical power subsystems are required to be

OPERABLE.

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-----NOTE-------Separate Condition entry is allowed for each battery.

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| CONDITION                                                                                           | REQUIRED ACTION                                       | COMPLETION TIME |
|-----------------------------------------------------------------------------------------------------|-------------------------------------------------------|-----------------|
| A. One [or two] batter[y][ies on one subsystemtrain] with one or more battery cells float voltage < | A.1 Perform SR 3.8.4.1.  AND                          | 2 hours         |
| [2.07] V.                                                                                           | A.2 Perform SR 3.8.6.1.  AND                          | 2 hours         |
|                                                                                                     | A.3 Restore affected cell voltage ≥ [2.07] V.         | 24 hours        |
| B. One [or two] batter[y][ies on one subsystemtrain] with float current > [2]                       | B.1 Perform SR 3.8.4.1. <u>AND</u>                    | 2 hours         |
| amps.                                                                                               | B.2 Restore battery float current to $\leq$ [2] amps. | [12] hours      |

# ACTIONS (continued)

| , , , , , ,                    | <del>, , , , , , , , , , , , , , , , , , , </del>                                            |                   |                                                                                                       | T.              |  |
|--------------------------------|----------------------------------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------|-----------------|--|
| CO                             | ONDITION                                                                                     |                   | REQUIRED ACTION                                                                                       | COMPLETION TIME |  |
| Required A completed           | NOTE<br>action C.2 shall be<br>if electrolyte level<br>the top of plates.                    | Requir            | red Actions C.1 and C.2 are oplicable if electrolyte level elow the top of plates.                    |                 |  |
| on one<br>with on<br>electrol  | two] batter[y][ies<br>subsystemtrain]<br>e or more cells<br>yte level less                   | C.1<br><u>AND</u> | Restore electrolyte level to above top of plates.                                                     | 8 hours         |  |
| than mi<br>establis<br>limits. | inimum<br>shed design                                                                        | C.2               | Verify no evidence of leakage.                                                                        | 12 hours        |  |
|                                |                                                                                              | AND               |                                                                                                       |                 |  |
|                                |                                                                                              | C.3               | Restore electrolyte level to greater than or equal to minimum established design limits.              | 31 days         |  |
| on one<br>with pile<br>tempera | two] batter[y][ies subsystemtrain] ot cell electrolyte ature less than m established limits. | D.1               | Restore battery pilot cell temperature to greater than or equal to minimum established design limits. | 12 hours        |  |
| redunda<br>trains w            | more batteries in<br>ant subsystems<br>with battery<br>eters not within                      | E.1               | Restore battery parameters for batteries in one subsystem train to within limits.                     | 2 hours         |  |

# ACTIONS (continued)

|    | CONDITION                                                                                                                               |     | REQUIRED ACTION                        | COMPLETION TIME |
|----|-----------------------------------------------------------------------------------------------------------------------------------------|-----|----------------------------------------|-----------------|
| F. | Required Action and associated Completion Time of Condition A, B, C, D, or E not met.                                                   | F.1 | Declare associated battery inoperable. | Immediately     |
|    | One [or two] batter[y][ies on one subsystemtrain] with one or more battery cells float voltage < [2.07] V and float current > [2] amps. |     |                                        |                 |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                           | FREQUENCY |
|------------|------------------------------------------------------------------------------------------------------------------------|-----------|
| SR 3.8.6.1 | Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. |           |
|            | Verify each battery float current is $\leq$ [2] amps.                                                                  | 7 days    |
| SR 3.8.6.2 | Verify each battery pilot cell $\frac{\text{float}}{\text{voltage}}$ is $\geq$ [2.07] V.                               | 31 days   |
| SR 3.8.6.3 | Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.    | 31 days   |
| SR 3.8.6.4 | Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.              | 31 days   |

# SURVEILLANCE REQUIREMENTS (continued)

|            | - NEGOTIEMENTO (CONTINUOS)                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                  |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
|            | SURVEILLANCE                                                                                                                                                                                                                                                                                                                                                                                                                                                     | FREQUENCY                                                                                                        |
| SR 3.8.6.5 | Verify each battery connected cell <u>float</u> voltage is $\geq$ [2.07] V.                                                                                                                                                                                                                                                                                                                                                                                      | 92 days                                                                                                          |
| SR 3.8.6.6 | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, portions of this Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR.  Verify battery capacity is ≥ [80%] of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | 60 months  AND  12 months when battery shows degradation, or has reached                                         |
|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | [85]% of the expected life with capacity < 100% of manufacturer's rating                                         |
|            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating |

# 5.5 Programs and Manuals

# 5.5.17 <u>Battery Monitoring and Maintenance Program</u>

This Program provides for battery restoration and maintenance, based on [the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer] which includes ing the following:

- a. Actions to restore battery cells with float voltage < [2.13] V; and
- b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the minimum established design limit; and-
- c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.

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#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### BACKGROUND

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment and preferred AC vital bus power (via inverters). As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the recommendations of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The [125/250] VDC electrical power system consists of two independent and redundant safety related Class 1E DC electrical power subsystems ([Train A and Train B]). Each subsystem consists of [two] 125 VDC batteries [(each battery [50]% capacity)], the associated battery charger(s) for each battery, and all the associated control equipment and interconnecting cabling.

[ The 250 VDC source is obtained by use of the two 125 VDC batteries connected in series. Additionally there is [one] spare battery charger per subsystem, which provides backup service in the event that the preferred battery charger is out of service. If the spare battery charger is substituted for one of the preferred battery chargers, then the requirements of independence and redundancy between subsystems are maintained. ]

During normal operation, the [125/250] VDC load is powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC load is automatically powered from the station batteries.

The [Train A and Train B] DC electrical power subsystems provide the control power for its associated Class 1E AC power load group, [4.16] kV switchgear, and [480] V load centers. The DC electrical power subsystems also provide DC electrical power to the inverters, which in turn power the AC vital buses.

The DC power distribution system is described in more detail in the Bases for LCO 3.8.9, "Distributions System Operating," and for LCO 3.8.10, "Distribution Systems - Shutdown."

# BACKGROUND (continued)

Each 125/250 VDC battery is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystem to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [There is no sharing between redundant Class 1E subsystems, such as batteries, battery chargers, or distribution panels.]

Each battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for Train A and Train B DC electrical power subsystems are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The minimum design voltage limit is [105/210] V.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each Train A and Train B DC electrical power subsystem battery charger has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger also has sufficient excess capacity to restore the battery from the design minimum charge to its fully charged state within [24] hours while supplying normal steady state loads discussed in the FSAR, Chapter [8] (Ref. 4).

# BACKGROUND (continued)

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 5) and Chapter [15] (Ref. 6), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC sources is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining the DC sources OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power and
- b. A worst-case single failure.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

# **LCO**

The DC electrical power subsystems, each subsystem consisting of [two] batteries, battery charger [for each battery] and the corresponding control equipment and interconnecting cabling supplying power to the associated bus within the <a href="trainsubsystem">trainsubsystem</a> are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any <a href="train">train</a> DC electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4).

An OPERABLE DC electrical power subsystem requires all required batteries and respective chargers to be operating and connected to the associated DC bus(es).

### **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure safe unit operation and to ensure that:

- Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients and
- b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 5 and 6 are addressed in the Bases for LCO 3.8.5, "DC Sources - Shutdown."

#### **ACTIONS**

### A.1, A.2, and A.3

Condition A represents one trainsubsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

| BASES | В | Α | S | Е | S |
|-------|---|---|---|---|---|
|-------|---|---|---|---|---|

# ACTIONS (continued)

-----REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

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A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has is now been fully recharged capable of supplying the maximum expected load requirement. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

# ACTIONS (continued)

# -----REVIEWER'S NOTE-----

Any licensee wishing to adopt Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications", and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, a 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hoursdays. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hourday Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

# <u>B.1</u>

# ------REVIEWER'S NOTES------

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177 and 1.174, "An Approach for Plant-Specific, Risk-Informed Decision Making: Technical Specifications."
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one subsystem] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one trainsubsystem with one [or two] batter[y][ies] inoperable. With one [or two] batter[y][ies] inoperable, the DC bus is being supplied by the OPERABLE battery charger[s]. Any event that

DC Sources - Operating B 3.8.4

results in a loss of the AC bus supporting the battery charger[s] will also result in loss of DC to that <a href="trainsubsystem">trainsubsystem</a>. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[y][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[y][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific completion times.

# ACTIONS (continued)

# <u>C.1</u>

Condition C represents one trainsubsystem with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected trainsubsystem. The 2 hour limit is consistent with the allowed time for an inoperable DC distribution subsystem train.

If one of the required DC electrical power subsystems is inoperable for reasons other than Condition A or B (e.g., inoperable battery charger and associated inoperable battery), the remaining DC electrical power subsystem has the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure could, however, result in the loss of <a href="mailto:the-minimum">the-minimum</a> necessary DC electrical subsystems to mitigate a worst case accident, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 7) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

# D.1 and D.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 5 is consistent with the time required in Regulatory Guide 1.93 (Ref. 7).

# SURVEILLANCE REQUIREMENTS

# SR 3.8.4.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the battery chargers, which support the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a

# SURVEILLANCE REQUIREMENTS (continued)

fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life (expected to be approximately 20 years). The 7 day Frequency is consistent with manufacturer recommendations and IEEE 450 (Ref. 8).

## SR 3.8.4.2

This SR verifies the design capacity of the battery chargers. According to Regulatory Guide 1.32 (Ref. 89), the battery charger supply is recommended to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period is sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the battery service test and will need to be supplemented with additional loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage, temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is  $\leq$  [2] amps.

# SURVEILLANCE REQUIREMENTS (continued)

The Surveillance Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these [18 month] intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

### SR 3.8.4.3

A battery service test is a special test of the battery capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length should correspond to the design duty cycle requirements as specified in Reference 4.

The Surveillance Frequency of [18 months] is consistent with the recommendations of Regulatory Guide 1.32 (Ref. 89) and Regulatory Guide 1.129 (Ref. 910), which state that the battery service test should be performed during refueling operations, or at some other outage, with intervals between tests not to exceed [18 months].

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test.

The reason for Note 2 is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned events that satisfy this SR.

| REFERENCES | 1.           | 10 CFR 50, Appendix A, GDC 17.         |
|------------|--------------|----------------------------------------|
|            | 2.           | Regulatory Guide 1.6, March 10, 1971.  |
|            | 3.           | IEEE-308-[1978].                       |
|            | 4.           | FSAR, Chapter [8].                     |
|            | 5.           | FSAR, Chapter [6].                     |
|            | 6.           | FSAR, Chapter [15].                    |
|            | 7.           | Regulatory Guide 1.93, December 1974.  |
|            | 8.           |                                        |
|            | <u>8</u> 9.  | Regulatory Guide 1.32, February 1977.  |
|            | <u>9</u> 10. | Regulatory Guide 1.129, December 1974. |

#### B 3.8 ELECTRICAL POWER SYSTEMS

#### B 3.8.5 DC Sources - Shutdown

#### **BASES**

### **BACKGROUND**

A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating."

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [15] (Ref. 2), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum DC electrical power sources during MODES 5 and 6 and during movement of [recently] irradiated fuel assemblies ensures that:

- a. The unit can be maintained in the shutdown or refueling condition for extended periods,
- Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status, and
- c. Adequate DC electrical power is provided to mitigate events postulated during shutdown, such as a fuel handling accident [involving handling recently irradiated fuel. Due to radioactive decay, DC electrical power is only required to mitigate fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)].

In general, when the unit is shut down, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many DBAs that are

# APPLICABLE SAFETY ANALYSES (continued)

analyzed in MODES [1, 2, 3, and 4] have no specific analyses in MODES [5 and 6] because the energy contained within the reactor pressure boundary, reactor coolant temperature and pressure, and the corresponding stresses result in the probabilities of occurrence being significantly reduced or eliminated, and in minimal consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

The shutdown Technical Specification requirements are designed to ensure that the unit has the capability to mitigate the consequences of certain postulated accidents. Worst case DBAs which are analyzed for operating MODES are generally viewed not to be a significant concern during shutdown MODES due to the lower energies involved. The Technical Specifications therefore require a lesser complement of electrical equipment to be available during shutdown than is required during operating MODES. More recent work completed on the potential risks associated with shutdown, however, have found significant risk associated with certain shutdown evolutions. As a result, in addition to the requirements established in the Technical Specifications, the industry has adopted NUMARC 91-06, "Guidelines for Industry Actions to Assess Shutdown Management," as an Industry initiative to manage shutdown tasks and associated electrical support to maintain risk at an acceptable low level. This may require the availability of additional equipment beyond that required by the shutdown Technical Specifications.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO

The DC electrical power subsystems, [each required] [the required] subsystem consisting of two batteries, one battery charger per battery, and the corresponding control equipment and interconnecting cabling within the <a href="trainsubsystem">trainsubsystem</a>, [are] [is] required to be OPERABLE to support [required] [one] <a href="trainsubsystem">trainsubsystem</a>[s] of distribution systems required [OPERABLE by LCO 3.8.10, "Distribution Systems - Shutdown."] This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents [involving handling recently irradiated fuel]).

#### APPLICABILITY

The DC electrical power sources required to be OPERABLE in MODES 5 and 6, and during movement of [recently] irradiated fuel assemblies provide assurance that:

- Required features needed to mitigate a fuel handling [involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)] accident are available,
- b. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available, and
- Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.4.

### **ACTIONS**

LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, 3, or 4 would require the unit to be shutdown unnecessarily.

## A.1, A.2, and A.3

------REVIEWER'S NOTE------

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both <a href="mailto:trainsubsystems">trainsubsystems</a> of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one <a href="mailto:trainsubsystem">trainsubsystem</a> of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as ACTION A.

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Condition A represents one trainsubsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or

#### ACTIONS (continued)

equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

#### -----REVIEWER'S NOTE------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

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A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting modes, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit modes that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

# ACTIONS (continued)

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

#### ------REVIEWER'S NOTE-----

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hourss-days. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour-day Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

# B.1, B.2.1, B.2.2, B.2.3, and B.2.4

[If two trainssubsystems are required by LCO 3.8.10, the remaining trainsubsystem with DC power available may be capable of supporting sufficient systems to allow continuation of CORE ALTERATIONS and [recently] irradiated fuel movement]. By allowing the option to declare required features inoperable with the associated DC power source(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO ACTIONS. In many instances this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of [recently] irradiated fuel assemblies. and operations involving positive reactivity additions) that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6). Suspending positive reactivity additions that could result in failure to meet the minimum SDM or boron concentration limit is required to assure continued safety operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that what would be required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron

concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

# ACTIONS (continued)

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystem[s] and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

# SURVEILLANCE REQUIREMENTS

### SR 3.8.5.1

SR 3.8.5.1 states that Surveillances required by SR 3.8.4.1 through SR 3.8.4.3 are applicable in these MODES. See the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

#### **REFERENCES**

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [15].

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

# B 3.8.6 Battery Parameters

#### **BASES**

#### **BACKGROUND**

This LCO delineates the limits on battery float current as well as electrolyte temperature, level, and float voltage for the DC power subsystem batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown." In addition to the limitations of this Specification, the [licensee controlled program] also implements a program specified in Specification 5.5.17 for monitoring various battery parameters that is based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead-Acid Batteries For Stationary Applications" (Ref. 1).

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 3) and Chapter [15] (Ref. 4), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one trainsubsystem of DC sources OPERABLE during accident conditions, in the event of:

a. An assumed loss of all offsite AC power or all onsite AC power and

# APPLICABLE SAFETY ANALYSES (continued)

b. A worst-case single failure.

Battery parameters satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

### LCO

Battery parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Battery parameter limits are conservatively established, allowing continued DC electrical system function even with limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.17.

### **APPLICABILITY**

The battery parameters are required solely for the support of the associated DC electrical power subsystems. Therefore, battery parameter limits are only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.4 and LCO 3.8.5.

#### **ACTIONS**

### A.1, A.2, and A.3

With one or more cells in one or more batteries in one trainsubsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

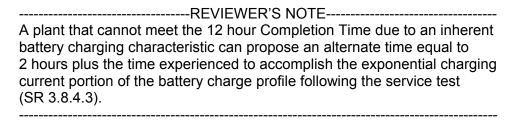
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# ACTIONS (continued)

# B.1 and B.2

One or more batteries in one trainsubsystem with float current > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "<u>OR</u>" statement in Condition F is applicable and the battery must be declared inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action B.2) from any discharge that might have occurred due to a temporary loss of the battery charger.



# ACTIONS (continued)

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

### C.1, C.2, and C.3

With one or more batteries in one trainsubsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.17, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.17.b item to initiate action to equalize and test in accordance with manufacturer's recommendation are taken from Annex D of IEEE Standard 450-1995. They are performed following the restoration of the electrolyte level to above the top of the plates. Based on the results of the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

## ACTIONS (continued)

# <u>D.1</u>

With one or more batteries in one trainsubsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

# <u>E.1</u>

With one or more batteries in redundant trainsubsystems with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one trainsubsystem within 2 hours.

## F.1

With one or more batteries with any battery parameter outside the allowances of the Required Actions for Condition A, B, C, D, or E, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding battery must be declared inoperable. Additionally, discovering one or more batteries in one <a href="trainsubsystem">trainsubsystem</a> with one or more battery cells float voltage less than [2.07] V and float current greater than [2] amps indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately.

## SURVEILLANCE REQUIREMENTS

#### SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The float current requirements are based on the float current indicative of a charged battery. Use of float current to determine the state of charge of the battery is consistent with IEEE-450 (Ref. 1). The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

#### SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge, which could eventually render the battery inoperable. Float voltages in this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.17. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The Frequency is consistent with IEEE-450 (Ref. 1).

## SURVEILLANCE REQUIREMENTS (continued)

## SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provide the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

## SURVEILLANCE REQUIREMENTS (continued)

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's ratings. Degradation is indicated, according to IEEE-450 (Ref. 1), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is  $\geq$  [10%] below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned events that satisfy this SR.

| B/ (OLO    |   |                                  |       |
|------------|---|----------------------------------|-------|
| REFERENCES | 1 | 1. IEEE-450 <del>-[1995]</del> . | <br>1 |
|            | 2 | 2. FSAR, Chapter [8].            |       |
|            | 3 | 3. FSAR, Chapter [6].            |       |
|            | 4 | 4. FSAR, Chapter [15].           |       |
|            | 5 | 5. IEEE-485-[1983], June 1983.   |       |

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.4 DC Sources - Operating

LCO 3.8.4 The [Division 1 and Division 2 station service, and DG 1B, 2A, and 2C]

DC electrical power subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

# **ACTIONS**

| CONDITION                                                                                  |            | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|--------------------------------------------------------------------------------------------|------------|-----------------------------------------------------------------------------------------------------|---------------------|
| One [or two] battery charger[s] on one divisionsubsystem; inoperable.                      | A.1        | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
|                                                                                            | AND        |                                                                                                     |                     |
|                                                                                            | A.2        | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
|                                                                                            | <u>AND</u> |                                                                                                     |                     |
|                                                                                            | A.3        | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours 7 days   |
| [B. One [or two] batter[y][ies on one divisionsubsystem] inoperable.                       | B.1        | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours ]         |
| C. One DC electrical power subsystem inoperable for reasons other than Condition A [or B]. | C.1        | Restore DC electrical power subsystem to OPERABLE status.                                           | [2] hours           |

#### 3.8 ELECTRICAL POWER SYSTEMS

#### 3.8.5 DC Sources - Shutdown

LCO 3.8.5

[DC electrical power subsystems shall be OPERABLE to support the DC electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems - Shutdown."]

[One DC electrical power subsystem shall be OPERABLE.]

This second option above applies for plants having a pre-ITS licensing basis (CTS) for electrical power requirements during shutdown conditions that required only one DC electrical power subsystem to be OPERABLE. Action A and the bracketed optional wording in Condition B are also eliminated for this case. The first option above is adopted for plants that

have a CTS requiring the same level of DC electrical power subsystem support as is required for power operating conditions.

-----

APPLICABILITY:

MODES 4 and 5,

During movement of [recently] irradiated fuel assemblies in the

[secondary] containment.

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|--------------|------------------|----|--------|----|-----|
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LCO 3.0.3 is not applicable.

| CONDITION                                                                | REQUIRED ACTION                                                                                         | COMPLETION TIME |
|--------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-----------------|
| [A. One [or two] battery charger[s on one divisionsubsystem] inoperable. | A.1 Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours         |
| AND                                                                      | AND                                                                                                     |                 |
| The redundant division subsystem battery and charger[s] OPERABLE.        |                                                                                                         |                 |

# ACTIONS (continued)

| ACTIONS (continued)                                                                           |                  |                                                                                           |                     |
|-----------------------------------------------------------------------------------------------|------------------|-------------------------------------------------------------------------------------------|---------------------|
| CONDITION                                                                                     |                  | REQUIRED ACTION                                                                           | COMPLETION TIME     |
|                                                                                               | A.2              | Verify battery float current ≤ [2] amps.                                                  | Once per [12] hours |
|                                                                                               | <u>AND</u>       |                                                                                           |                     |
|                                                                                               | A.3              | Restore battery charger[s] to OPERABLE status.                                            | [72] hours 7 days   |
| B. One [or more] required DC electrical power subsystem[s] inoperable [for reasons other than | B.1<br><u>OR</u> | Declare affected required feature(s) inoperable.                                          | Immediately         |
| Condition A.                                                                                  | B.2.1            | Suspend CORE                                                                              | Immediately         |
| <u>OR</u>                                                                                     | <i>D.</i> 2.1    | ALTERATIONS.                                                                              | minibalatory        |
| Required Action and associated Completion                                                     | <u>AN</u>        | <u>ID</u>                                                                                 |                     |
| Time of Condition A not met.]                                                                 | B.2.2            | Suspend movement of [recently] irradiated fuel assemblies in the [secondary] containment. | Immediately         |
|                                                                                               | <u>AN</u>        | <u>ID</u>                                                                                 |                     |
|                                                                                               | B.2.3            | Initiate action to suspend operations with a potential for draining the reactor vessel.   | Immediately         |
|                                                                                               | <u>AN</u>        | I <u>D</u>                                                                                |                     |
|                                                                                               | B.2.4            | Initiate action to restore required DC electrical power subsystems to OPERABLE status.    | Immediately         |

#### 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.6 Battery Parameters

## --REVIEWER'S NOTE-

Licensees must implement a program, as specified in Specification 5.5.14, to monitor battery parameters that is based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead-Acid Batteries For Stationary Applications."

LCO 3.8.6 Battery parameters for the [station service and DG] <u>electrical power</u> <u>subsystem</u> batteries shall be within limits.

APPLICABILITY: When associated DC electrical power subsystems are required to be OPERABLE.

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Separate Condition entry is allowed for each battery.

| CONDITION                                                                                                                        |                   | REQUIRED ACTION                                   | COMPLETION TIME |
|----------------------------------------------------------------------------------------------------------------------------------|-------------------|---------------------------------------------------|-----------------|
| A. One [or two] batter[y][ies on one divisionsubsystem] with                                                                     | A.1<br><u>AND</u> | Perform SR 3.8.4.1.                               | 2 hours         |
| one or more battery cells float voltage < [2.07] V.                                                                              | A.2<br><u>AND</u> | Perform SR 3.8.6.1.                               | 2 hours         |
|                                                                                                                                  | A.3               | Restore affected cell voltage ≥ [2.07] V.         | 24 hours        |
| B. One [or two] batter[y][ies on one <a href="mailto:subsystem_division">subsystem_division</a> ] with float current > [2] amps. | B.1<br><u>AND</u> | Perform SR 3.8.4.1.                               | 2 hours         |
| noat current > [2] amps.                                                                                                         | B.2               | Restore battery float current to $\leq$ [2] amps. | [12] hours      |

# ACTIONS (continued)

| (continued)                                                                                                                                   | 1    |                                                                                                       | Т               |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------|------|-------------------------------------------------------------------------------------------------------|-----------------|--|
| CONDITION                                                                                                                                     |      | REQUIRED ACTION                                                                                       | COMPLETION TIME |  |
| Required Action C.2 shall be completed if electrolyte level was below the top of plates.                                                      | NOTE |                                                                                                       |                 |  |
| C. One [or two] batter[y][ies on one subsystem division] with one or more cells electrolyte level less than minimum                           | C.1  | Restore electrolyte level to above top of plates.                                                     | 8 hours         |  |
| established design<br>limits.                                                                                                                 | C.2  | Verify no evidence of leakage.                                                                        | 12 hours        |  |
|                                                                                                                                               | AND  |                                                                                                       |                 |  |
|                                                                                                                                               | C.3  | Restore electrolyte level to greater than or equal to minimum established design limits.              | 31 days         |  |
| D. One [or two] batter[y][ies on one subsystem division] with pilot cell electrolyte temperature less than minimum established design limits. | D.1  | Restore battery pilot cell temperature to greater than or equal to minimum established design limits. | 12 hours        |  |
| E. One or more batteries in redundant subsystems divisions with battery parameters not within limits.                                         | E.1  | Restore battery parameters for batteries in one subsystem division to within limits.                  | 2 hours         |  |

# ACTIONS (continued)

|    | CONDITION                                                                                                             |     | REQUIRED ACTION                        | COMPLETION TIME |
|----|-----------------------------------------------------------------------------------------------------------------------|-----|----------------------------------------|-----------------|
| F. | Required Action and associated Completion Time of Condition A, B, C, D, or E not met.  OR  One [or two] batter[y][ies | F.1 | Declare associated battery inoperable. | Immediately     |
|    | on one subsystem division] with one or more battery cells float voltage < [2.07] V and float current > [2] amps.      |     |                                        |                 |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                           | FREQUENCY |
|------------|------------------------------------------------------------------------------------------------------------------------|-----------|
| SR 3.8.6.1 | Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. |           |
|            | Verify each battery float current is $\leq$ [2] amps.                                                                  | 7 days    |
| SR 3.8.6.2 | Verify each battery pilot cell $\frac{\text{float}}{\text{voltage}}$ voltage is $\geq$ [2.07] V.                       | 31 days   |
| SR 3.8.6.3 | Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.    | 31 days   |
| SR 3.8.6.4 | Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.              | 31 days   |

# SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE                                                                                                   | FREQUENCY                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.5 Verify each battery connected cell <u>float</u> voltage is $\geq$ [2.07] V.                         | 92 days                                                                                                                                                                                                                                                      |
| manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | 60 months  AND  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's |

# 5.5.14 <u>Battery Monitoring and Maintenance Program</u>

This Program provides for battery restoration and maintenance, based on [the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer] of which includes the following:

- a. Actions to restore battery cells with float voltage  $< [2.13] V_{i,7}$  and
- b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the minimum established design limit; and-
- c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### **BACKGROUND**

The DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment. Also, these DC subsystems provide DC electrical power to inverters, which in turn power the AC vital buses. As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the recommendations of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The station service DC power sources provide both motive and control power to selected safety related equipment, as well as circuit breaker control power for the nonsafety related 4160 V, and all 600 V and lower, AC distribution systems. Each DC subsystem is energized by one 125/250 V station service battery and three 125 V battery chargers (two normally inservice chargers and one spare charger). Each battery is exclusively associated with a single 125/250 VDC bus. Each set of battery chargers exclusively associated with a 125/250 VDC subsystem cannot be interconnected with any other 125/250 VDC subsystem. The normal and backup chargers are supplied from the same AC load groups for which the associated DC subsystem supplies the control power. The loads between the redundant 125/250 VDC subsystem are not transferable except for the Automatic Depressurization System, the logic circuits and valves of which are normally fed from the Division 1 DC system.

The diesel generator (DG) DC power sources provide control and instrumentation power for their respective DG. In addition, DG 2A and 2C DC power sources provide circuit breaker control power for the loads on the 4160 V 2E, 2F, and 2G emergency buses. Each DG DC subsystem is energized by one 125 V battery and one 125 V battery charger. Provisions exist for connecting a portable alternate battery charger.

During normal operation, the DC loads are powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC loads are automatically powered from the station batteries.

## BACKGROUND (continued)

The DC power distribution system is described in more detail in Bases for LCO 3.8.9, "Distribution System - Operating," and LCO 3.8.10, "Distribution System - Shutdown."

Each DC battery subsystem is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystems to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [There is no sharing between redundant Class 1E subsystems such as batteries, battery chargers, or distribution panels.]

Each battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for DC electrical power subsystems are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The minimum design voltage limit is [105/210] V.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each battery charger of DC electrical power subsystem has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each station service battery charger has sufficient excess capacity to restore the battery from the design minimum charge to its fully charged state within [24] hours while supplying normal steady state loads (Ref. 4).

## BACKGROUND (continued)

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

## APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 5) and Chapter [15] (Ref. 6), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation. The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining DC sources OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power and
- b. A worst case single failure.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## **LCO**

The DC electrical power subsystems - with: 1) each station service DC subsystem consisting of two 125 V batteries in series two battery chargers and the corresponding control equipment and interconnecting cabling supplying power to the associated bus, and 2) each DG DC subsystem consisting of one battery bank, one battery charger, and the corresponding control equipment and interconnecting cabling are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any DC electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4).

#### **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, and 3 to ensure safe unit operation and to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients and
- b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 4 and 5 are addressed in the Bases for LCO 3.8.5, "DC Sources - Shutdown."

#### **ACTIONS**

## A.1, A.2, and A.3

Condition A represents one divisionsubsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

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|----|---|---|---|
|----|---|---|---|

## ACTIONS (continued)

------REVIEWER'S NOTE------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

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A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it <a href="https://has-is.nowbeen-fully-recharged\_capable\_of\_supplying the maximum expected load\_requirement">https://has-is.nowbeen-fully-recharged\_capable\_of\_supplying the maximum expected load\_requirement</a>. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

## ACTIONS (continued)

## -----REVIEWER'S NOTE-----

Any licensee wishing to adopt Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications", and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, a 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hoursdays. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hoursday Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

# <u>B.1</u>

## ------REVIEWER'S NOTES------

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177 and 1.174., "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications."
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one subsystem] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one divisionsubsystem with one [or two] batter[y][ies] inoperable. With one [or two] batter[y][ies] inoperable, the DC bus is being supplied by the OPERABLE battery charger[s]. Any

DC Sources - Operating B 3.8.4

event that results in a loss of the AC bus supporting the battery charger[s] will also result in loss of DC to that divisionsubsystem. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[y][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[y][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific completion times.

## ACTIONS (continued)

# <u>C.1</u>

Condition C represents one divisionsubsystem with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is therefore imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected divisionsubsystem. The 2 hour limit is consistent with the allowed time for an inoperable DC Distribution System divisionsubsystem.

If one of the required DC electrical power subsystems is inoperable for reasons other than Condition A or B (e.g., inoperable battery charger and associated inoperable battery), the remaining DC electrical power subsystems have the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure could, however, result in the loss of <a href="mailto:the-minimum">the-minimum</a> necessary DC electrical subsystems to mitigate a worst case accident, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 7) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

# D.1 and D.2

If the inoperable station service DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 4 is consistent with the time required in Regulatory Guide 1.93 (Ref. 7).

## ACTIONS (continued)

# <u>E.1</u>

If the DG DC electrical power subsystem cannot be restored to OPERABLE status in the associated Completion Time, the associated DG may be incapable of performing its intended function and must be immediately declared inoperable. This declaration also requires entry into applicable Conditions and Required Actions for an inoperable DG, LCO 3.8.1, "AC Sources - Operating."

## SURVEILLANCE REQUIREMENTS

#### SR 3.8.4.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the battery chargers, which support the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life (expected to be approximately 20 years). The 7 day Frequency is consistent with manufacturer recommendations and IEEE-450 (Ref. 8).

#### SR 3.8.4.2

This SR verifies the design capacity of the battery chargers. According to Regulatory Guide 1.32 (Ref. 89), the battery charger supply is recommended to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

## SURVEILLANCE REQUIREMENTS (continued)

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period is sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the battery service test and will need to be supplemented with additional loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage, temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is ≤ [2] amps.

The Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these [18 month] intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

## SR 3.8.4.3

A battery service test is a special test of the battery's capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length corresponds to the design duty cycle requirements as specified in Reference 4.

The Frequency of [18 months] is consistent with the recommendations of Regulatory Guide 1.32 (Ref. 89) and Regulatory Guide 1.129 (Ref. 910), which state that the battery service test should be performed during refueling operations or at some other outage, with intervals between tests not to exceed [18 months].

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test.

## SURVEILLANCE REQUIREMENTS (continued)

The reason for Note 2 is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned events that satisfy this SR.

#### REFERENCES

- 1. 10 CFR 50, Appendix A, GDC 17.
- 2. Regulatory Guide 1.6, March 10, 1971.
- 3. IEEE Standard 308, 1978.
- 4. FSAR, Chapter [8].
- 5. FSAR, Chapter [6].
- 6. FSAR, Chapter [15].
- 7. Regulatory Guide 1.93.
- IEEE Standard 450, 1995.
- 89. Regulatory Guide 1.32, February 1977.
- 910. Regulatory Guide 1.129, December 1974.

#### B 3.8 ELECTRICAL POWER SYSTEMS

#### B 3.8.5 DC Sources - Shutdown

#### **BASES**

# **BACKGROUND**

A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating."

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [15] (Ref. 2), assume that Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators (DGs), emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum DC electrical power sources during MODES 4 and 5 and during movement of [recently] irradiated fuel assemblies ensures that:

- The facility can be maintained in the shutdown or refueling condition for extended periods,
- b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status, and
- c. Adequate DC electrical power is provided to mitigate events postulated during shutdown, such as an inadvertent draindown of the vessel or a fuel handling accident [involving handling recently irradiated fuel. Due to radioactive decay, DC electrical power is only required to mitigate fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)].

In general, when the unit is shut down, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many Design Basis Accidents (DBAs) that are analyzed in MODES 1, 2, and 3 have no specific analyses in MODES 4 and 5. Worst case bounding events are deemed not credible in MODES 4 and 5 because the energy contained

## APPLICABLE SAFETY ANALYSES (continued)

within the reactor pressure boundary, reactor coolant temperature and pressure, and the corresponding stresses result in the probabilities of occurrence being significantly reduced or eliminated, and in minimal consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

The shutdown Technical Specification requirements are designed to ensure that the unit has the capability to mitigate the consequences of certain postulated accidents. Worst case DBAs which are analyzed for operating MODES are generally viewed not to be a significant concern during shutdown MODES due to the lower energies involved. The Technical Specifications therefore require a lesser complement of electrical equipment to be available during shutdown than is required during operating MODES. More recent work completed on the potential risks associated with shutdown, however, have found significant risk associated with certain shutdown evolutions. As a result, in addition to the requirements established in the Technical Specifications, the industry has adopted NUMARC 91-06, "Guidelines for Industry Actions to Assess Shutdown Management," as an Industry initiative to manage shutdown tasks and associated electrical support to maintain risk at an acceptable low level. This may require the availability of additional equipment beyond that required by the shutdown Technical Specifications.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO

The DC electrical power subsystems - with: 1) [each required] [the required] station service DC subsystem consisting of two 125 V batteries in series, two battery chargers, and the corresponding control equipment and interconnecting cabling; and 2) [each required] [the required] DG DC subsystem consisting of one battery bank, one battery charger, and the corresponding control equipment and interconnecting cabling - [are] [is] required to be OPERABLE to support [required] [one] DC distribution subsystem[s] [required OPERABLE by LCO 3.8.10, "Distribution Systems - Shutdown."] This requirement ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents [involving handling recently irradiated fuel] and inadvertent reactor vessel draindown).

## **APPLICABILITY**

The DC electrical power sources required to be OPERABLE in MODES 4 and 5 and during movement of [recently] irradiated fuel assemblies in the secondary containment provide assurance that:

- Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core in case of an inadvertent draindown of the reactor vessel,
- Required features needed to mitigate a fuel handling accident [involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)] are available,
- c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available, and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, and 3 are covered in LCO 3.8.4.

#### **ACTIONS**

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since irradiated fuel assembly movement can occur in MODE 1, 2, or 3, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, or 3 would require the unit to be shutdown unnecessarily.

# A.1, A.2, and A.3

------REVIEWER'S NOTE------

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both divisions subsystems of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one division subsystem of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as ACTION A.

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## ACTIONS (continued)

(SR 3.8.4.3).

Condition A represents one divisionsubsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test

,

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

## ACTIONS (continued)

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

## -----REVIEWER'S NOTE-----

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours days. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour day Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

## B.1, B.2.1, B.2.2, B.2.3, and B.2.4

[If more than one DC distribution subsystem is required according to LCO 3.8.10, the DC subsystems remaining OPERABLE with one or more DC power sources inoperable may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS, [recently] irradiated fuel movement, and operations with a potential for draining the reactor vessel.] By allowance of the option to declare required features inoperable with associated DC power sources inoperable, appropriate restrictions are implemented in accordance with the affected system LCOs' ACTIONS. In many instances, this option may

DC Sources - Shutdown B 3.8.5

involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of [recently] irradiated fuel assemblies, and any activities that could result in inadvertent draining of the reactor vessel).

## ACTIONS (continued)

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystem[s] and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the plant safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the plant safety systems may be without sufficient power.

# SURVEILLANCE REQUIREMENTS

# SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.3. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

## **REFERENCES**

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [15].

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

## B 3.8.6 Battery Parameters

#### **BASES**

#### **BACKGROUND**

This LCO delineates the limits on battery float current as well as electrolyte temperature, level, and float voltage for the DC electrical power subsystems batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown." In addition to the limitations of this Specification, the [licensee controlled program] also implements a program specified in Specification 5.5.14 for monitoring various battery parameters—that is based on the recommendations of IEEE Standard 450–1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead-Acid Batteries For Stationary Applications" (Ref. 1).

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in FSAR, Chapter [6] (Ref. 3) and Chapter [15] (Ref. 4), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power subsystems provide normal and emergency DC electrical power for the diesel generators (DGs), emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one <a href="divisionsubsystem">divisionsubsystem</a> of DC sources OPERABLE during accident conditions, in the event of:

a. An assumed loss of all offsite AC or all onsite AC power and

## APPLICABLE SAFETY ANALYSES (continued)

b. A worst case single failure.

Since battery parameters support the operation of the DC electrical power subsystems, they satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

#### LCO

Battery parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Battery parameter limits are conservatively established, allowing continued DC electrical system function even with limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.14.

#### **APPLICABILITY**

The battery parameters are required solely for the support of the associated DC electrical power subsystem. Therefore, battery parameter limits are only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussions in Bases for LCO 3.8.4 and LCO 3.8.5.

#### **ACTIONS**

#### A.1, A.2, and A.3

With one or more cells in one or more batteries in one divisionsubsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

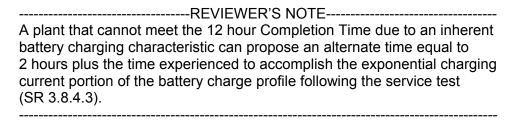
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## ACTIONS (continued)

## B.1 and B.2

One or more batteries in one division subsystem with float > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "<u>OR</u>" statement in Condition F is applicable and the battery must be declared inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action B.2) from any discharge that might have occurred due to a temporary loss of the battery charger.



## ACTIONS (continued)

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

#### C.1, C.2, and C.3

With one or more batteries in one divisionsubsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.14, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.14.b item to initiate action to equalize and test in accordance with manufacturer's recommendation are taken from Annex D of IEEE Standard 450-1995. They are performed following the restoration of the electrolyte level to above the top of the plates. Based on the results of the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

## ACTIONS (continued)

# <u>D.1</u>

With one or more batteries in one divisionsubsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

# <u>E.1</u>

With one or more batteries in redundant divisions subsystems with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one divisions upbsystem within 2 hours.

## F.1

When any battery parameter is outside the allowances of the Required Actions for Condition A, B, C, D, or E, sufficient capacity to supply the maximum expected load requirement is not ensured and the corresponding battery must be declared inoperable. Additionally, discovering one or more batteries in one divisionsubsystem with one or more battery cells float voltage less than [2.07] V and float current greater than [2] amps indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately.

## SURVEILLANCE REQUIREMENTS

#### SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The float current requirements are based on the float current indicative of a charged battery. Use of float current to determine the state of charge of the battery is consistent with IEEE-450 (Ref. 1). The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

#### SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge, which could eventually render the battery inoperable. Float voltages in this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.14. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The Frequency is consistent with IEEE-450 (Ref. 1).

## SURVEILLANCE REQUIREMENTS (continued)

## SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provided the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance, the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

## SURVEILLANCE REQUIREMENTS (continued)

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity ≥ 100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 3), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is 10% below the manufacturer's rating. All these Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned events that satisfy this Surveillance.

| 5, 1020    |    |                                                       |  |
|------------|----|-------------------------------------------------------|--|
| REFERENCES | 1. | . IEEE <del>-Standard _</del> 450 <del>, 1995</del> . |  |
|            | 2. | . FSAR, Chapter [8].                                  |  |
|            | 3. | . FSAR, Chapter [6].                                  |  |
|            | 4. | . FSAR, Chapter [15].                                 |  |
|            | 5. | . IEEE Standard 485, 1983.                            |  |

# 3.8 ELECTRICAL POWER SYSTEMS

#### DC Sources - Operating 3.8.4

The [Division 1], [Division 2], and [Division 3] DC electrical power subsystems shall be OPERABLE. LCO 3.8.4

APPLICABILITY: MODES 1, 2, and 3.

# **ACTIONS**

| CONDITION                                                                                                |      | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|----------------------------------------------------------------------------------------------------------|------|-----------------------------------------------------------------------------------------------------|---------------------|
| <ul> <li>A. One [or two] battery charger[s] on one divisionsubsystem] inoperable.</li> </ul>             | A.1  | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
|                                                                                                          | AND  |                                                                                                     |                     |
|                                                                                                          | A.2  | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
|                                                                                                          | AND  |                                                                                                     |                     |
|                                                                                                          | A. 3 | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours 7 days   |
| [B. One [or two] batter[y][ies on one divisionsubsystem] inoperable.                                     | B.1  | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours ]         |
| C. [Division 1 or 2] DC electrical power subsystem inoperable for reasons other than Condition A [or B]. | C.1  | Restore [Division 1 and 2]<br>DC electrical power<br>subsystems to OPERABLE<br>status.              | [2] hours           |

#### 3.8 ELECTRICAL POWER SYSTEMS

#### 3.8.5 DC Sources - Shutdown

LCO 3.8.5

[DC electrical power subsystem(s) shall be OPERABLE to support the electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems - Shutdown."]

[One DC electrical power subsystem shall be OPERABLE.]

This second option above applies for plants having a pre-ITS licensing basis (CTS) for electrical power requirements during shutdown conditions that required only one DC electrical power subsystem to be OPERABLE. Action A and the bracketed optional wording in Condition B are also eliminated for this case. The first option above is adopted for plants that have a CTS requiring the same level of DC electrical power subsystem support as is required for power operating conditions.

\_\_\_\_\_

APPLICABILITY:

MODES 4 and 5,

During movement of [recently] irradiated fuel assemblies in the [primary or secondary] containment.

#### ACTIONS

LCO 3.0.3 is not applicable.

------NOTE------

| CONDITION                                                                 |     | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|---------------------------------------------------------------------------|-----|-----------------------------------------------------------------------------------------------------|---------------------|
| [ A. One [or two] battery charger[s on one divisionsubsystem] inoperable. | A.1 | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
| AND                                                                       | AND |                                                                                                     |                     |
| The redundant division subsystem battery and charger[s] OPERABLE.         | A.2 | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
| charger[5] OF LIVABLE.                                                    | AND |                                                                                                     |                     |

# ACTIONS (continued)

|                  |                                                                                                      | <del>,</del>                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------|------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  | REQUIRED ACTION                                                                                      | COMPLETION TIME                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| A.3              | Restore battery charger[s] to OPERABLE status.                                                       | [72] hours7 days-]                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| B.1<br><u>OR</u> | Declare affected required feature(s) inoperable.                                                     | Immediately                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| B.2.1            | Suspend CORE ALTERATIONS.                                                                            | Immediately                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| AND              |                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| B.2.2            | Suspend movement of [recently] irradiated fuel assemblies in the [primary or secondary] containment. | Immediately                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <u>AN</u>        | <u>ID</u>                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| B.2.3            | Initiate action to suspend operations with a potential for draining the reactor vessel.              | Immediately                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| AN               | <u>ID</u>                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| B.2.4            | Initiate action to restore required DC electrical power subsystems to OPERABLE status.               | Immediately                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                  | B.1  OR  B.2.1  AN  B.2.2  AN  B.2.3                                                                 | A.3 Restore battery charger[s] to OPERABLE status.  B.1 Declare affected required feature(s) inoperable.  OR  B.2.1 Suspend CORE ALTERATIONS.  AND  B.2.2 Suspend movement of [recently] irradiated fuel assemblies in the [primary or secondary] containment.  AND  B.2.3 Initiate action to suspend operations with a potential for draining the reactor vessel.  AND  B.2.4 Initiate action to restore required DC electrical power subsystems to |

## 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.6 Battery Parameters

------REVIEWER'S NOTE------

Licensees must implement a program, as specified in Specification 5.5.14, to monitor battery parameters that is based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead Acid Batteries For Stationary Applications."

LCO 3.8.6 Battery parameters for the [Division 1, 2, and 3] <u>electrical power</u>

subsystem batteries shall be within limits.

APPLICABILITY: When associated DC electrical power subsystems are required to be

OPERABLE.

| Δ | C | ΓI | $\cap$ | N  | C |
|---|---|----|--------|----|---|
| н |   | ш  | U      | IV | O |

-----NOTE-------NOTE------

Separate Condition entry is allowed for each battery.

| CONDITION                                                            |            | REQUIRED ACTION                                   | COMPLETION TIME |
|----------------------------------------------------------------------|------------|---------------------------------------------------|-----------------|
| A. One [or two] batter[y][ies on one division subsystem] with one or | A.1<br>AND | Perform SR 3.8.4.1.                               | 2 hours         |
| more battery cells float voltage < [2.07] V.                         | A.2        | Perform SR 3.8.6.1.                               | 2 hours         |
|                                                                      | <u>AND</u> |                                                   |                 |
|                                                                      | A.3        | Restore affected cell voltage ≥ [2.07] V.         | 24 hours        |
| B. One [or two] batter[y][ies on one subsystem                       | B.1        | Perform SR 3.8.4.1.                               | 2 hours         |
| division] with float                                                 | <u>AND</u> |                                                   |                 |
| current > [2] amps.                                                  | B.2        | Restore battery float current to $\leq$ [2] amps. | [12] hours      |

# ACTIONS (continued)

| (Criono (continued)                                                                                                                           | 1                 |                                                                                                       | T               |  |
|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------|-----------------|--|
| CONDITION                                                                                                                                     |                   | REQUIRED ACTION                                                                                       | COMPLETION TIME |  |
| Required Action C.2 shall be completed if electrolyte level was below the top of plates.                                                      | Requir            | red Actions C.1 and C.2 are pplicable if electrolyte level elow the top of plates.                    |                 |  |
| C. One [or two] batter[y][ies on one subsystem division] with one or more cells electrolyte                                                   | C.1<br><u>AND</u> | Restore electrolyte level to above top of plates.                                                     | 8 hours         |  |
| level less than minimum established design limits.                                                                                            | C.2               | Verify no evidence of leakage.                                                                        | 12 hours        |  |
|                                                                                                                                               | <u>AND</u>        |                                                                                                       |                 |  |
|                                                                                                                                               | C.3               | Restore electrolyte level to greater than or equal to minimum established design limits.              | 31 days         |  |
| D. One [or two] batter[y][ies on one subsystem division] with pilot cell electrolyte temperature less than minimum established design limits. | D.1               | Restore battery pilot cell temperature to greater than or equal to minimum established design limits. | 12 hours        |  |
| E. One or more batteries in redundant subsystems divisions with battery parameters not within limits.                                         | E.1               | Restore battery parameters for batteries in one subsystem division to within limits.                  | 2 hours         |  |

# ACTIONS (continued)

| CONDITION |                                                                                                                       |     | REQUIRED ACTION                        | COMPLETION TIME |
|-----------|-----------------------------------------------------------------------------------------------------------------------|-----|----------------------------------------|-----------------|
| F.        | Required Action and associated Completion Time of Condition A, B, C, D, or E not met.  OR  One [or two] batter[y][ies | F.1 | Declare associated battery inoperable. | Immediately     |
|           | on one subsystem division] with one or more battery cells float voltage < [2.07] V and float current > [2] amps.      |     |                                        |                 |

# SURVEILLANCE REQUIREMENTS

|            | FREQUENCY                                                                                                              |         |
|------------|------------------------------------------------------------------------------------------------------------------------|---------|
| SR 3.8.6.1 | Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. |         |
|            | Verify each battery float current is $\leq$ [2] amps.                                                                  | 7 days  |
| SR 3.8.6.2 | Verify each battery pilot cell $\frac{\text{float}}{\text{voltage}}$ voltage is $\geq$ [2.07] V.                       | 31 days |
| SR 3.8.6.3 | Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.    | 31 days |
| SR 3.8.6.4 | Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.              | 31 days |

# SURVEILLANCE REQUIREMENTS (continued)

| CONVENEZATION | TEQUITEMENTO (continued)                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                     |
|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               | SURVEILLANCE                                                                                                                                                                                                                                                                                                                                                                                                                                                          | FREQUENCY                                                                                                                                                                                                                                                           |
| SR 3.8.6.5    | Verify each battery connected cell $\frac{\text{float}}{\text{loat}}$ voltage is $\geq$ [2.07] V.                                                                                                                                                                                                                                                                                                                                                                     | 92 days                                                                                                                                                                                                                                                             |
| SR 3.8.6.6    | This Surveillance shall not normally be performed in MODE 1, 2, or 3. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR.  Verify battery capacity is ≥ [80%] of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | 60 months  AND  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating |

# 5.5 Programs and Manuals

## 5.5.13 <u>Primary Containment Leakage Rate Testing Program</u> (continued)

- b. The calculated peak containment internal pressure for the design basis loss of coolant accident, P<sub>a</sub>, is [45 psig]. The containment design pressure is [50 psig].
- c. The maximum allowable containment leakage rate, L<sub>a</sub>, at P<sub>a</sub>, shall be []% of containment air weight per day.
- d. Leakage rate acceptance criteria are:
  - 1. Containment leakage rate acceptance criterion is  $\leq$  1.0 L<sub>a</sub>. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are < 0.60 L<sub>a</sub> for the Type B and C tests and [< 0.75 L<sub>a</sub> for Option A Type A tests] [ $\leq$  0.75 L<sub>a</sub> for Option B Type A tests].
  - 2. Air lock testing acceptance criteria are:
    - a) Overall air lock leakage rate is  $\leq [0.05 L_a]$  when tested at  $\geq P_a$ .
    - b) For each door, leakage rate is  $\leq$  [0.01 L<sub>a</sub>] when pressurized to [ $\geq$  10 psig].
- e. The provisions of SR 3.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.
- f. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

#### 5.5.14 Battery Monitoring and Maintenance Program

This Program provides for battery restoration and maintenance, based on [the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer] of which includes the following:

- a. Actions to restore battery cells with float voltage < [2.13] V; and
- b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the minimum established design limit; and
- c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.</p>

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### **BACKGROUND**

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment. As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the requirements of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The 125 VDC electrical power system consists of three independent Class 1E DC electrical power subsystems, Divisions 1, 2, and 3. Each subsystem consists of a battery, associated battery charger(s), and all the associated control equipment and interconnecting cabling.

During normal operation, the DC loads are powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC loads are automatically powered from the Engineered Safety Feature (ESF) batteries.

Each of the Division 1 and 2 electrical power subsystems provides the control power for its associated Class 1E AC power load group, 4.16 kV switchgear, and 480 V load centers. Also, these DC subsystems provide DC electrical power to the inverters, which in turn power the AC vital buses. The Division 3 DC electrical power subsystem provides DC motive and control power as required for the High Pressure Core Spray (HPCS) System diesel generator (DG) set control and protection.

The DC power distribution system is described in more detail in Bases for LCO 3.8.9, "Distribution Systems - Operating," and LCO 3.8.10, "Distribution Systems - Shutdown."

Each DC battery subsystem is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystems to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [There is no sharing between redundant Class 1E subsystems such as batteries, battery chargers, or distribution panels.]

## BACKGROUND (continued)

Each Division 1 and 2 battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref. 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors. The Division 3 battery has adequate storage to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref. 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for a DC electrical power subsystem are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The minimum design voltage limit is [105/210] V.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each battery charger of Division 1 and 2 DC electrical power subsystem has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger has sufficient excess capacity to restore the battery bank from the design minimum charge to its fully charged state within [12] hours while supplying normal steady state loads (Ref. 4).

The battery charger of Division 3 DC electrical power subsystem has sufficient excess capacity to restore the battery bank from the design minimum charge to its fully charged state in [8] hours while supplying normal steady state loads (Ref. 4).

## BACKGROUND (continued)

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

## APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 5) and Chapter [15] (Ref. 6), assume that ESF systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining DC sources OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC power or of all onsite AC power and
- b. A worst case single failure.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

#### LCO

The DC electrical power subsystems, each subsystem consisting of one battery, one battery charger, and the corresponding control equipment and interconnecting cabling supplying power to the associated bus within the <a href="divisionsubsystem">divisionsubsystem</a>s, are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any DC electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4).

## **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, and 3 to ensure safe unit operation and to ensure that:

- Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients and
- b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 4 and 5 are addressed in the Bases for LCO 3.8.5, "DC Sources - Shutdown."

#### **ACTIONS**

#### A.1, A.2, and A.3

Condition A represents one divisionsubsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

| BASE | ΞS |
|------|----|
|------|----|

## ACTIONS (continued)

------REVIEWER'S NOTE------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

\_\_\_\_\_

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it <a href="https://has-is.nowbeen-fully-recharged\_capable\_of\_supplying the maximum expected load\_requirement">https://has-is.nowbeen-fully-recharged\_capable\_of\_supplying the maximum expected load\_requirement</a>. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

| BASE | ΞS |
|------|----|
|------|----|

## ACTIONS (continued)

# -----REVIEWER'S NOTE-----

Any licensee wishing to adopt Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications", and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, a 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours days. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour day Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

# <u>B.1</u>

## -----REVIEWER'S NOTES------

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177 and RG 1.174., "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications."
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one subsystem] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one <u>divisionsubsystem</u> with one [or two] batter[y][ies] inoperable. With one [or two] batter[y][ies] inoperable, the

DC Sources - Operating B 3.8.4

DC bus is being supplied by the OPERABLE battery charger[s]. Any event that results in a loss of the AC bus supporting the battery charger[s] will also result in loss of DC to that divisionsubsystem. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[y][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[y][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific completion times.

## ACTIONS (continued)

# <u>C.1</u>

Condition C represents one divisionsubsystem with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is, therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected divisionsubsystem. The 2 hour limit is consistent with the allowed time for an inoperable DC distribution subsystem division.

If one of the required [Division 1 or 2] DC electrical power subsystems is inoperable for reasons other than Condition A or B (e.g., inoperable battery charger and associated inoperable battery), the remaining DC electrical power subsystems have the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure could, however, result in the loss of <a href="mailto:the\_minimum">the\_minimum</a> necessary DC electrical subsystems, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 7) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

#### D.1

With the Division 3 DC electrical power subsystem inoperable for reasons other than Condition A or B, the HPCS and 2C Standby Service Water System may be incapable of performing their intended functions and must be immediately declared inoperable. This declaration also requires entry into applicable Conditions and Required Actions of LCO 3.5.1, "ECCS - Operating," [and LCO 3.7.1, "Standby Service Water (SSW)] System and [Ultimate Heat Sink (UHS)"]].

## SURVEILLANCE REQUIREMENTS (continued)

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period is sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the battery service test and will need to be supplemented with additional loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage, temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is ≤ [2] amps.

The Surveillance Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these [18 month] intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

## SR 3.8.4.3

A battery service test is a special test of the battery's capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length corresponds to the design duty cycle requirements as specified in Reference 4.

The Surveillance Frequency of [18 months] is consistent with the recommendations of Regulatory Guide 1.32 (Ref. 89) and Regulatory Guide 1.129 (Ref. 940), which state that the battery service test should be performed during refueling operations or at some other outage, with intervals between tests not to exceed [18 months].

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test.

## SURVEILLANCE REQUIREMENTS (continued)

The reason for Note 2 is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned events that satisfy the Surveillance.

#### REFERENCES

- 1. 10 CFR 50, Appendix A, GDC 17.
- 2. Regulatory Guide 1.6, March 10, 1971.
- 3. IEEE Standard 308, 1978.
- 4. FSAR, Chapter [8].
- 5. FSAR, Chapter [6].
- 6. FSAR, Chapter [15].
- 7. Regulatory Guide 1.93, December 1974.
- IEEE Standard 450, 1995.
- 89. Regulatory Guide 1.32, February 1977.
- 910. Regulatory Guide 1.129, December 1974.

#### B 3.8 ELECTRICAL POWER SYSTEMS

#### B 3.8.5 DC Sources - Shutdown

#### **BASES**

#### **BACKGROUND**

A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating."

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [15] (Ref. 2), assume that Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum DC electrical power sources during MODES 4 and 5 and during movement of [recently] irradiated fuel assemblies ensures that:

- a. The facility can be maintained in the shutdown or refueling condition for extended periods,
- b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status, and
- c. Adequate DC electrical power is provided to mitigate events postulated during shutdown, such as an inadvertent draindown of the vessel or a fuel handling accident [involving handling recently irradiated fuel. Due to radioactive decay, DC electrical power is only required to mitigate fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)].

In general, when the unit is shut down, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many Design Basis Accidents (DBAs) that are analyzed in MODES 1, 2, and 3 have no specific analyses in MODES 4 and 5. Worst case bounding events are deemed not credible in MODES 4 and 5 because the energy contained

## APPLICABLE SAFETY ANALYSES (continued)

within the reactor pressure boundary, reactor coolant temperature and pressure, and the corresponding stresses result in the probabilities of occurrence being significantly reduced or eliminated, and in minimal consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

The shutdown Technical Specification requirements are designed to ensure that the unit has the capability to mitigate the consequences of certain postulated accidents. Worst case DBAs which are analyzed for operating MODES are generally viewed not to be a significant concern during shutdown MODES due to the lower energies involved. The Technical Specifications therefore require a lesser complement of electrical equipment to be available during shutdown than is required during operating MODES. More recent work completed on the potential risks associated with shutdown, however, have found significant risk associated with certain shutdown evolutions. As a result, in addition to the requirements established in the Technical Specifications, the industry has adopted NUMARC 91-06, "Guidelines for Industry Actions to Assess Shutdown Management," as an industry initiative to manage shutdown tasks and associated electrical support to maintain risk at an acceptable low level. This may require the availability of additional equipment beyond that required by the shutdown Technical Specifications.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

**LCO** 

The DC electrical power subsystems, [each required] [the required] consisting of [two] battery banks, [one or two] battery charger[s], and the corresponding control equipment and interconnecting cabling within the divisionsubsystem, are required to be OPERABLE to support [required] [one] divisionsubsystem[s] of Distribution System [divisionsubsystems required OPERABLE by LCO 3.8.10, "Distribution Systems - Shutdown."][.] This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents [involving handling recently irradiated fuel] and inadvertent reactor vessel draindown).

**APPLICABILITY** 

The DC electrical power sources required to be OPERABLE in MODES 4 and 5 and during movement of [recently] irradiated fuel assemblies in the [primary or secondary containment] provide assurance that:

## APPLICABILITY (continued)

- Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core in case of an inadvertent draindown of the reactor vessel,
- Required features needed to mitigate a fuel handling accident [involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous [X] days)] are available,
- c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available, and
- Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, and 3 are covered in LCO 3.8.4.

#### **ACTIONS**

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since irradiated fuel assembly movement can occur in MODE 1, 2, or 3, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, or 3 would require the unit to be shutdown unnecessarily.

#### A.1, A.2, and A.3

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both divisions subsystems of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one division subsystem of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as ACTION A.

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## ACTIONS (continued)

Condition A represents one divisionsubsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to

2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting modes, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

## ACTIONS (continued)

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

## -----REVIEWER'S NOTE-----

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours days. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour day Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

#### B.1, B.2.1, B.2.2, B.2.3, and B.2.4

[If more than one DC distribution subsystem is required according to LCO 3.8.10, the DC subsystems remaining OPERABLE with one or more DC power sources inoperable may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS, [recently] irradiated fuel movement, and operations with a potential for draining the reactor vessel.] By allowing the option to declare required features inoperable with associated DC power source(s) inoperable, appropriate restrictions are implemented in accordance with the affected system LCOs' ACTIONS. In many instances this option may involve

undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of [recently] irradiated fuel assemblies, and any activities that could result in inadvertent draining of the reactor vessel).

## ACTIONS (continued)

## E.1 and E.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the associated Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 4 is consistent with the time required in Regulatory Guide 1.93 (Ref. 7).

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.4.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the battery chargers, which support the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life (expected to be approximately 20 years). The 7 day Frequency is consistent with manufacturer recommendations and IEEE 450 (Ref. 8).

#### SR 3.8.4.2

This SR verifies the design capacity of the battery chargers. According to Regulatory Guide 1.32 (Ref. 89), the battery charger supply is recommended to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

## B 3.8.6 Battery Parameters

#### **BASES**

#### BACKGROUND

This LCO delineates the limits on battery float current as well as electrolyte temperature, level, and float voltage for the DC power source batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown." In addition to the limitations of this Specification, the [licensee controlled program] also implements a program specified in Specification 5.5.14 for monitoring various battery parameters that is based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice For Maintenance, Testing, And Replacement Of Vented Lead-Acid Batteries For Stationary Applications" (Ref. 1).

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in FSAR, Chapter [6] (Ref. 3) and Chapter [15] (Ref. 4), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power subsystems provide normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one <a href="divisionsubsystem">divisionsubsystem</a> of DC sources OPERABLE during accident conditions, in the event of:

a. An assumed loss of all offsite AC power or all onsite AC power and

## APPLICABLE SAFETY ANALYSES (continued)

b. A worst case single failure.

Since battery parameters support the operation of the DC power sources, they satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

#### LCO

Battery parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Battery parameter limits are conservatively established, allowing continued DC electrical system function even with limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.14.

#### **APPLICABILITY**

The battery parameters are required solely for the support of the associated DC electrical power subsystem. Therefore, battery parameter limits are only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.4 and LCO 3.8.5.

#### **ACTIONS**

#### A.1, A.2, and A.3

With one or more cells in one or more batteries in one divisionsubsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

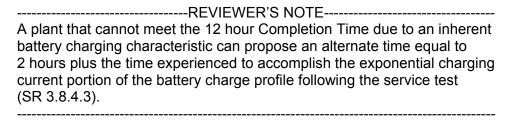
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## ACTIONS (continued)

## B.1 and B.2

One or more batteries in one division subsystem with float > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "<u>OR</u>" statement in Condition F is applicable and the battery must be declared inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action B.2) from any discharge that might have occurred due to a temporary loss of the battery charger.



## ACTIONS (continued)

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

#### C.1, C.2, and C.3

With one or more batteries in one divisionsubsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.14, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.14.b item to initiate action to equalize and test in accordance with manufacturer's recommendation are taken from Annex D of IEEE Standard 450-1995. They are performed following the restoration of the electrolyte level to above the top of the plates. Based on the results of the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

## ACTIONS (continued)

# <u>D.1</u>

With one or more batteries in one divisionsubsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

# <u>E.1</u>

With one or more batteries in redundant divisions subsystems with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one division subsystem within 2 hours.

## <u>F.1</u>

When any battery parameter is outside the allowances of the Required Actions for Condition A, B, C, D, or E, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding battery must be declared inoperable. Additionally, discovering one or more batteries in one divisionsubsystem with one or more battery cells float voltage less than [2.07] V and float current greater than [2] amps indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately.

## SURVEILLANCE REQUIREMENTS

#### SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The float current requirements are based on the float current indicative of a charged battery. Use of float current to determine the state of charge of the battery is consistent with IEEE-450 (Ref. 1). The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

#### SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge, which could eventually render the battery inoperable. Float voltages in this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.14. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The Frequency is consistent with IEEE-450 (Ref. 1).

## SURVEILLANCE REQUIREMENTS (continued)

## SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provided the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance, the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

## SURVEILLANCE REQUIREMENTS (continued)

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity ≥ 100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 3), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is 10% below the manufacturer's rating. All these Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. This restriction from normally performing the Surveillance in MODE 1 or 2 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance. corrective modification, deficient or incomplete surveillance testing, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced. This assessment shall, as a minimum, consider the potential outcomes and transients associated with a failed partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for the assessment. Credit may be taken for unplanned events that satisfy this SR.

| 5, 1020    |    |                                   |   |
|------------|----|-----------------------------------|---|
| REFERENCES | 1. | IEEE <u>-</u> Standard 450, 1995. | _ |
|            | 2. | FSAR, Chapter [8].                |   |
|            | 3. | FSAR, Chapter [6].                |   |
|            | 4. | FSAR, Chapter [15].               |   |
|            | 5. | IEEE Standard 485, 1983.          | _ |

#### ACTIONS (continued)

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystem[s] and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the plant safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the plant safety systems may be without sufficient power.

## SURVEILLANCE REQUIREMENTS

#### SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.3 Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

## **REFERENCES**

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [15].

# **Attachment B**

**Revisions to Revision 1 of the ISTS NUREGs** 

(NUREG-1430, -1431, -1432, -1433, and -1434)

## 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.4 DC Sources - Operating

LCO 3.8.4 The Train A and Train B DC electrical power subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

# **ACTIONS**

| CONDITION                                                                                  |              | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|--------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------|---------------------|
| A. One [or two] battery charger[s] on one subsystem inoperable.                            | <u>A.1</u>   | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
|                                                                                            | AND          |                                                                                                     |                     |
|                                                                                            | A.2          | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
|                                                                                            | AND          |                                                                                                     |                     |
|                                                                                            | <u>A.3</u>   | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours          |
| [B. One [or two] batter[y][ies on one subsystem] inoperable.                               | B.1          | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours ]         |
| CA.One DC electrical power subsystem inoperable for reasons other than Condition A [or B]. | <u>C</u> A.1 | Restore DC electrical power subsystem to OPERABLE status.                                           | [2] hours           |
| DB.Required Action and Associated Completion                                               | <u>D</u> B.1 | Be in MODE 3.                                                                                       | 6 hours             |
| Time not met.                                                                              | <u>AND</u>   |                                                                                                     |                     |
|                                                                                            | <u>D</u> B.2 | Be in MODE 5.                                                                                       | 36 hours            |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                                     | FREQUENCY |
|------------|----------------------------------------------------------------------------------------------------------------------------------|-----------|
| SR 3.8.4.1 | Verify battery terminal voltage is ≥ [129/258] V on float charge greater than or equal to the minimum established float voltage. | 7 days    |

# SURVEILLANCE REQUIREMENTS (continued)

|                      | SURVEILLANCE                                                                                                                                                                                                                        | FREQUENCY          |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| SR 3.8.4.2           | Verify no visible corrosion at battery terminals and connectors.                                                                                                                                                                    | <del>92 days</del> |
|                      | <u>OR</u>                                                                                                                                                                                                                           |                    |
|                      | Verify battery connection resistance [is $\leq$ [1E-5 ohm] for inter-cell connections, $\leq$ [1E-5 ohm] for inter-rack connections, $\leq$ [1E-5 ohm] for inter-tier connections, and $\leq$ [1E-5 ohm] for terminal connections]. |                    |
| SR 3.8.4.3           | Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration.                                                                                                                | [12] months        |
| SR 3.8.4.4           | Remove visible terminal corrosion and verify battery cell to cell and terminal connections are [clean and tight, and are] coated with anti-corrosion material.                                                                      | [12] months        |
| SR 3.8.4.4           | Remove visible terminal corrosion and verify battery cell to cell and terminal connections are [clean and tight, and are] coated with anti-corrosion material.                                                                      | [12] months        |
| SR 3.8.4.5           | Verify battery connection resistance [is ≤ [1E-5 ohm] for inter-cell connections, ≤ [1E-5 ohm] for inter-rack connections, ≤ [1E-5 ohm] for inter-tier connections, and ≤ [1E-5 ohm] for terminal connections].                     | [12] months        |
| SR 3.8.4. <u>2</u> 6 | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.                                                                                             |                    |
|                      | Verify each battery charger supplies ≥ [400] amps at greater than or equal to the minimum established float voltage ≥ [125/250] V for ≥ [8] hours.                                                                                  | [18 months]        |
|                      | <u>OR</u>                                                                                                                                                                                                                           |                    |
|                      | Verify each battery charger can recharge the battery                                                                                                                                                                                |                    |

DC Sources - Operating 3.8.4

| to the fully charged state within [24] hours while |  |
|----------------------------------------------------|--|
| supplying the largest combined demands of the      |  |
| various continuous steady state loads, after a     |  |
| battery discharge to the bounding design basis     |  |
| event discharge state.                             |  |
|                                                    |  |

# SURVEILLANCE REQUIREMENTS (continued)

|                      | SURVEILLANCE                                                                                                                                                                     | FREQUENCY   |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| SR 3.8.4. <u>3</u> 7 | 1. The modified performance discharge test in SR 3.8. <u>6.64.8</u> may be performed in lieu of the service test in SR 3.8.4. <u>37 once per 60 months</u> .                     |             |
|                      | 2. This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.                                       |             |
|                      | Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test. | [18 months] |

# SURVEILLANCE REQUIREMENTS (continued)

|            | SURVEILLANCE                                                                                                                                             | FREQUENCY                                                                                                                                                                                                                                                |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.4.8 | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.                  |                                                                                                                                                                                                                                                          |
|            | Verify battery capacity is ≥ [80]% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | AND  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating |

## 3.8 ELECTRICAL POWER SYSTEMS

## 3.8.5 DC Sources - Shutdown

LCO 3.8.5 DC electrical power subsystem shall be OPERABLE to support the DC

electrical power distribution subsystem(s) required by LCO 3.8.10,

"Distribution Systems - Shutdown."

APPLICABILITY: MODES 5 and 6,

During movement of irradiated fuel assemblies.

# **ACTIONS**

| CONDITION                                                                                   | REQUIRED ACTION                                                                                              | COMPLETION TIME     |
|---------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|---------------------|
| [A. One [or two] battery charger[s on one subsystem] inoperable.  AND                       | A.1 Restore battery terminal voltage to greater than or equal to the minimum established float voltage.  AND | 2 hours             |
| The redundant subsystem battery and charger[s] OPERABLE.                                    | A.2 Verify battery float current ≤ [2] amps.  AND                                                            | Once per [12] hours |
|                                                                                             | A.3 Restore battery charger[s] to OPERABLE status.                                                           | [72] hours ]        |
| BA. One or more required DC electrical power subsystems inoperable- [for reasons other than | BA.1 Declare affected required feature(s) inoperable.  OR                                                    | Immediately         |
| Condition A.] OR                                                                            | BA.2.1 Suspend CORE<br>ALTERATIONS.                                                                          | Immediately         |
| Required Actions and associated Completion Time of Condition A not met].                    | AND  BA.2.2 Suspend movement of irradiated fuel assemblies.                                                  | Immediately         |
|                                                                                             | AND                                                                                                          |                     |

| CONDITION | REQUIRED ACTION                                                                               | COMPLETION TIME |
|-----------|-----------------------------------------------------------------------------------------------|-----------------|
|           | BA.2.3 Initiate action to suspend operations involving positive reactivity additions.         | Immediately     |
|           | <u>AND</u>                                                                                    |                 |
|           | BA.2.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status. | Immediately     |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                                                                                                                                                                           | FREQUENCY                               |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| SR 3.8.5.1 | The following SRs are not required to be performed: SR 3.8.4.26, and SR 3.8.4.37, and SR 3.8.4.8.  For DC sources required to be OPERABLE, the following SRs are applicable:  SR 3.8.4.1 SR 3.8.4.4 SR 3.8.4.7 SR 3.8.4.2 SR 3.8.4.5 SR 3.8.4.8. SR 3.8.4.3 SR 3.8.4.6 | In accordance<br>with applicable<br>SRs |

#### 3.8 ELECTRICAL POWER SYSTEMS

## 3.8.6 Battery Cell Parameters

LCO 3.8.6 Battery cell-parameters for the Train A and Train B electrical power

subsystem batteries shall be within the limits of Table 3.8.6-1.

APPLICABILITY: When associated DC electrical power subsystems are required to be

OPERABLE.

| Λ | $\mathbb{C}^{1}$ | ГΙ | $\cap$ | N  | C   |
|---|------------------|----|--------|----|-----|
| м |                  |    | v      | ıv | . 7 |

-----NOTE-----

Separate Condition entry is allowed for each battery.

| CONDITION                                                                                            | REQUIRED ACTION                                                                                    | COMPLETION TIME                           |
|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-------------------------------------------|
| A. One or more batteries with one or more battery cell parameters not within Category A or B limits. | A.1 Verify pilot cell[s] electrolyte level and float voltage meet Table 3.8.6-1 Category C values. | <del>1 hour</del>                         |
|                                                                                                      | A.2 Verify battery cell parameters meet Table 3.8.6-1 Category C values.                           | 24 hours  AND  Once per 7 days thereafter |
|                                                                                                      | AND                                                                                                |                                           |
|                                                                                                      | A.3 Restore battery cell parameters to Category A and B limits of Table 3.8.6-1.                   | <del>31 days</del>                        |

# ACTIONS (continued)

| ACTIONS (continued)                                                                               | Т                                                                                                         | Τ               |
|---------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|-----------------|
| CONDITION                                                                                         | REQUIRED ACTION                                                                                           | COMPLETION TIME |
| A. One [or two] batter[y][ies on one subsystem] with one or more battery cells                    | A.1 Perform SR 3.8.4.1.  AND                                                                              | 2 hours         |
| float voltage < [2.07] V.                                                                         | A.2 Perform SR 3.8.6.1.                                                                                   | 2 hours         |
|                                                                                                   | AND  A.3 Restore affected cell  voltage ≥ [2.07] V.                                                       | 24 hours        |
| B. One [or two] batter[y][ies on one subsystem] with float current > [2] amps.                    | B.1 Perform SR 3.8.4.1.  AND                                                                              | 2 hours         |
|                                                                                                   | B.2 Restore battery float current to ≤ [2] amps.                                                          | [12] hours      |
| Required Action C.2 shall be completed if electrolyte level was below the top of plates.          | Required Actions C.1 and C.2 are only applicable if electrolyte level was below the top of plates.        |                 |
| C. One [or two] batter[y][ies on one subsystem] with one or more cells                            | C.1 Restore electrolyte level to above top of plates.                                                     | 8 hours         |
| electrolyte level less<br>than minimum<br>established design<br>limits.                           | AND  C.2 Verify no evidence of leakage.                                                                   | 12 hours        |
|                                                                                                   | AND                                                                                                       |                 |
|                                                                                                   | C.3 Restore electrolyte level to greater than or equal to minimum established design limits.              | <u>31 days</u>  |
| D. One [or two] batter[y][ies on one subsystem] with pilot cell electrolyte temperature less than | D.1 Restore battery pilot cell temperature to greater than or equal to minimum established design limits. | 12 hours        |

| minimum established<br>design limits.                                                                                                                                                                                                |              |                                                                             |             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------|-------------|
| E. One or more batteries in redundant subsystems with battery parameters not within limits.                                                                                                                                          | <u>E.1</u>   | Restore battery parameters for batteries in one subsystem to within limits. | 2 hours     |
| FB. Required Action and associated Completion Time of Condition A, B, C, D, or E not met.  OR                                                                                                                                        | <u>F</u> B.1 | Declare associated battery inoperable.                                      | Immediately |
| One [or two] batter[y][ies on one subsystems] with one or more battery cells float voltage < [2.07] V and float current > [2] amps. One or more batteries with average electrolyte temperature of the representative cells < [60]°F. |              |                                                                             |             |
| One or more batteries     with one or more battery     cell parameters not     within Category C     values.                                                                                                                         |              |                                                                             |             |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                         | FREQUENCY         |
|------------|----------------------------------------------------------------------|-------------------|
| SR 3.8.6.1 | Verify battery cell parameters meet Table 3.8.6-1 Category A limits. | <del>7 days</del> |

# SURVEILLANCE REQUIREMENTS (continued)

|                                  | attery cell parameters meet Table 3.8.6-1 y B limits.                                      | 92 days AND                                                                                                              |
|----------------------------------|--------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
|                                  |                                                                                            | Once within 24 hours after a battery discharge < [110] V  AND  Once within 24 hours after a battery overcharge > [150] V |
| •                                | verage electrolyte temperature of ontative cells is ≥ [60]°F.                              | <del>92 days</del>                                                                                                       |
| Not requ<br>voltage i            | s less than the minimum established float of SR 3.8.4.1.                                   |                                                                                                                          |
| Verify ea                        | ach battery float current is ≤ [2] amps.                                                   | 7 days                                                                                                                   |
| SR 3.8.6.2 Verify ea [2.07] V.   | ach battery pilot cell float voltage is ≥                                                  | 31 days                                                                                                                  |
|                                  | ach battery connected cell electrolyte level is than or equal to minimum established mits. | 31 days                                                                                                                  |
|                                  | ach battery pilot cell temperature is greater equal to minimum established design limits.  | 31 days                                                                                                                  |
| SR 3.8.6.5 Verify ea<br>≥ [2.07] | ach battery connected cell float voltage is V.                                             | 92 days                                                                                                                  |

| SR 3.8.6.6 ——NOTE——————————————————————————————————                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |            |                                                                                              |                                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test.  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity < 100% of the expected life with capacity < 100% of manufacturer's rating and the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating when battery has reached life with capacity ≥ 100% of manufacturer's rating when battery has reached life with capacity ≥ 100% of manufacturer's rating when battery has reached life with capacity ≥ 100% of m | SR 3.8.6.6 | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken |                                                                                                                                                                                                                                                   |
| rating                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |            | manufacturer's rating when subjected to a performance discharge test or a modified           | AND  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's |

# Table 3.8.6-1 (page 1 of 1) Battery Cell Surveillance Requirements

| PARAMETER              | CATEGORY A:<br>LIMITS FOR EACH<br>DESIGNATED<br>PILOT CELL                           | CATEGORY B:<br>LIMITS FOR EACH<br>CONNECTED CELL                                     | CATEGORY C:<br>ALLOWABLE LIMITS<br>FOR EACH<br>CONNECTED CELL                                           |
|------------------------|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Electrolyte Level      | > Minimum level indication mark, and ≤ ½ inch above maximum level indication mark(a) | ➤ Minimum level indication mark, and ≤ ¼ inch above maximum level indication mark(a) | Above top of plates, and not overflowing                                                                |
| Float Voltage          | ≥ 2.13 V                                                                             | ≥ 2.13 V                                                                             | > 2.07 V                                                                                                |
| Specific Gravity(b)(c) | <u>≥ [1.200]</u>                                                                     | ≥ [1.195]  AND  Average of all connected cells > [1.205]                             | Not more than 0.020 below average of all connected cells  AND  Average of all connected cells ≥ [1.1905 |

- (a) It is acceptable for the electrolyte level to temporarily increase above the specified maximum during equalizing charges provided it is not overflowing.
- (b) Corrected for electrolyte temperature and level. Level correction is not required, however, when battery charging is < [2] amps when on float charge.
- (c) A battery charging current of < [2] amps when on float charge is acceptable for meeting specific gravity limits following a battery recharge, for a maximum of [7] days. When charging current is used to satisfy specific gravity requirements, specific gravity of each connected cell shall be measured prior to expiration of the [7] day allowance.

# 5.5 Programs and Manuals

| 5.5.17 | Battery Monitoring and Maintenance Program                                                                                     |  |
|--------|--------------------------------------------------------------------------------------------------------------------------------|--|
|        | This Program provides for battery restoration and maintenance, which includes the following:                                   |  |
|        | a. Actions to restore battery cells with float voltage < [2.13] V;                                                             |  |
|        | b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plates; and |  |
|        | c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.      |  |

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### **BACKGROUND**

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment and preferred AC vital bus power (via inverters). As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the recommendations of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The [125/250] VDC electrical power system consists of two independent and redundant safety related Class 1E DC electrical power subsystems ([Train A and Train B]). Each subsystem consists of [two] 125 VDC batteries [(each battery [50]% capacity)], the associated battery charger[s] for each battery, and all the associated control equipment and interconnecting cabling.

[The 250 VDC source is obtained by use of the two 125 VDC batteries connected in series. Additionally, there is [one] spare battery charger per subsystem, which provides backup service in the event that the preferred battery charger is out of service. If the spare battery charger is substituted for one of the preferred battery chargers, then the requirements of independence and redundancy between subsystems are maintained.]

During normal operation, the [125/250] VDC load is powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC load is automatically powered from the station batteries.

The [Train A and Train B] DC electrical power subsystems provide the control power for its associated Class 1E AC power load group, [4.16] kV switchgear, and [480] V load centers. The DC electrical power subsystems also provide DC electrical power to the inverters, which in turn power the AC vital buses.

The DC power distribution system is described in more detail in Bases for LCO 3.8.9, "Distributions System - Operating," and for LCO 3.8.10, "Distribution Systems - Shutdown."

Each battery has adequate storage capacity to carry the required load continuously for at least 2 hours and to perform three complete cycles of intermittent loads discussed in the FSAR. Chapter [8] (Ref. 4).

## BACKGROUND (continued)

Each 125/250 VDC battery is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystem to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [There is no sharing between redundant Class 1E subsystems, such as batteries, battery chargers, or distribution panels.]

Each battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for Train A and Train B DC electrical power subsystems are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The minimum design voltage limit is [105/210] V. Battery size is based on 125% of required capacity and, after selection of an available commercial battery, results in a battery capacity in excess of 150% of required capacity. The voltage limit is 2.13 V per cell, which corresponds to a total minimum voltage output of 128 V per battery discussed in the FSAR, Chapter [8] (Ref. 4). The criteria for sizing large lead storage batteries are defined in IEEE-485 (Ref. 5).

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each Train A and Train B DC electrical power subsystem <u>battery charger</u> has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger also has sufficient <u>excess</u> capacity to restore the battery from the design minimum charge to its fully charged state within [24] hours while supplying normal steady state loads discussed in the FSAR, Chapter [8] (Ref. 4).

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

## APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 56) and Chapter [15] (Ref. 67), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC sources is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining the DC sources OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst-case single failure.

The DC sources satisfy Criterion 3 of the NRC Policy Statement.

#### LCO

The DC electrical power subsystems, each subsystem consisting of [two] batteries, battery charger [for each battery] and the corresponding control equipment and interconnecting cabling supplying power to the associated bus within the <u>train\_subsystem</u> are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any <u>train\_DC</u> electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4).

An OPERABLE DC electrical power subsystem requires all required batteries and respective chargers to be operating and connected to the associated DC bus(es).

#### **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure safe unit operation and to ensure that:

- Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 5 and 6 are addressed in the Bases for LCO 3.8.5, "DC Sources - Shutdown."

#### **ACTIONS**

#### A.1. A.2. and A.3

Condition A represents one subsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

#### -----REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging

<u>current portion of the battery charge profile following the service test</u> (SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it is now fully capable of supplying the maximum expected load requirement. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

------REVIEWER'S NOTE------

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, the 7 day Completion Time can be justified by an

acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

### B.1

## -----REVIEWER'S NOTES-----

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177 and RG 1.174.
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one division] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one subsystem with one [or two] batter[y][ies] inoperable. With one [or two] batter[y][ies] inoperable, the DC bus is being supplied by the OPERABLE battery charger[s]. Any event that results in a loss of the AC bus supporting the battery charger[s] will also result in loss of DC to that subsystem. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[y][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[y][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific Completion Times.

DC Sources - Operating B 3.8.4

## **CA.1**

Condition <u>CA</u> represents one <u>train\_subsystem</u> with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected-<u>trainsubsystem</u>. The 2 hour limit is consistent with the allowed time for an inoperable DC distribution <u>subsystem\_train</u>.

If one of the required DC electrical power subsystems is inoperable for reasons other than Condition A or B (e.g., inoperable battery, inoperable battery charger(s), or inoperable battery charger and associated inoperable battery), the remaining DC electrical power subsystem has the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst- case single failure cwould, however, result in the complete loss of the minimum necessary DC electrical subsystems to mitigate a worst case accident remaining 250/125 VDC electrical power subsystems with attendant loss of ESF functions, continued power operation should not exceed 2 hours. The

#### ACTIONS (continued)

2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 78) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

#### DB.1 and DB.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 5 is consistent with the time required in Regulatory Guide 1.93 (Ref. 78).

## SURVEILLANCE REQUIREMENTS

#### SR 3.8.4.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the battery chargers, which support the ability of the batteries to perform their intended function charging system and the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery (or battery cell) and maintain the battery (or a battery cell) in a fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life.. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The 7 day Frequency is consistent with manufacturer recommendations and IEEE-450 (Ref. 9).

#### SR 3.8.4.2

Visual inspection to detect corrosion of the battery cells and connections, or measurement of the resistance of each intercell, interrack, intertier, and

terminal connection, provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

#### SURVEILLANCE REQUIREMENTS (continued)

The limits established for this SR must be no more than 20% above the resistance as measured during installation or not above the ceiling value established by the manufacturer.

The Surveillance Frequency for these inspections, which can detect conditions that can cause power losses due to resistance heating, is 92 days. This Frequency is considered acceptable based on operating experience related to detecting corrosion trends.

#### SR 3.8.4.3

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

[The 12 month Frequency for this SR is consistent with IEEE-450 (Ref. 9), which recommends detailed visual inspection of cell condition and rack integrity on a yearly basis.]

#### SR 3.8.4.4 and SR 3.8.4.5

Visual inspection and resistance measurements of intercell, interrack, intertier, and terminal connections provide an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The anticorrosion material is used to help ensure good electrical connections and to reduce terminal deterioration. The visual inspection for corrosion is not intended to require removal of and inspection under each terminal connection. The removal of visible corrosion is a preventive maintenance SR. The presence of visible corrosion does not necessarily represent a failure of this SR provided visible corrosion is removed during performance of SR 3.8.4.4.

[Reviewer's Note: The requirement to verify that terminal connections are clean and tight applies only to nickel cadmium batteries as per IEEE Standard P1106, "IEEE Recommended Practice for Installation, Maintenance, Testing and Replacement of Vented Nickel - Cadmium Batteries for Stationary Applications." This requirement may be removed for lead acid batteries.]

The connection resistance limits for SR 3.8.4.5 shall be no more than 20% above the resistance as measured during installation, or not above the ceiling value established by the manufacturer.

#### SURVEILLANCE REQUIREMENTS (continued)

[The Surveillance Frequencies of [12] months is consistent with IEEE-450 (Ref. 9), which recommends cell to cell and terminal connection resistance measurement on a yearly basis.]

### SR 3.8.4.26

This SR verifies requires that each battery charger be capable of supplying [400] amps and [250/125] V for ≥ [8] hours. These requirements are based on the design capacity of the chargers (Ref. 4). According to Regulatory Guide 1.32 (Ref. 810), the battery charger supply is required recommended to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensure that these requirements can be satisfied.

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period is sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the battery service test and will need to be supplemented with additional loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage, temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is ≤ [2] amps.

The Surveillance Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these [18 month] intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and

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challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

## SR 3.8.4.37

A battery service test is a special test of the battery capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length should correspond to the design duty cycle requirements as specified in Reference 4.

The Surveillance Frequency of [18 months] is consistent with the recommendations of Regulatory Guide 1.32 (Ref. <u>8</u>10) and Regulatory Guide 1.129 (Ref. <u>9</u>11), which state that the battery service test should be performed during refueling operations, or at some other outage, with intervals between tests not to exceed [18 months].

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test-once per 60 months.

## SURVEILLANCE REQUIREMENTS (continued)

The modified performance discharge test is a simulated duty cycle consisting of just two rates; the one minute rate published for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere hours removed by a rated one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test should remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

The reason for Note 2 is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

## SR 3.8.4.8

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

A battery modified performance discharge test is described in the Bases for SR 3.8.4.7. Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.4.8; however, only the modified performance discharge test may be used to satisfy SR 3.8.4.8 while satisfying the requirements of SR 3.8.4.7 at the same time.

## SURVEILLANCE REQUIREMENTS (continued)

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 9) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's ratings. Degradation is indicated, according to IEEE-450 (Ref. 9), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is  $\geq$  [10%] below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 9).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

#### REFERENCES

- 1. 10 CFR.50, Appendix A, GDC 17.
- 2. Regulatory Guide 1.6, March 10, 1971.
- 3. IEEE-308-[1978].
- 4. FSAR, Chapter [8].
- IEEE-485-[1983], June 1983.
- 56. FSAR, Chapter [6].
- 67. FSAR, Chapter [15].
- 78. Regulatory Guide 1.93, December 1974.
  - 9. IEEE-450-[1987].
- <u>8</u>10. Regulatory Guide 1.32, February 1977.
- 911. Regulatory Guide 1.129, December 1974.

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#### **B 3.8 ELECTRICAL POWER SYSTEMS**

#### B 3.8.5 DC Sources - Shutdown

#### **BASES**

## **BACKGROUND** A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating." APPLICABLE The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [14] (Ref. 2), SAFETY assume that Engineered Safety Feature (ESF) systems are OPERABLE. **ANALYSES** The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation. The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY. The OPERABILITY of the minimum DC electrical power sources during MODES 5 and 6 and during movement of irradiated fuel assemblies ensures that: The unit can be maintained in the shutdown or refueling condition a. for extended periods; Sufficient instrumentation and control capability is available for b. monitoring and maintaining the unit status; and Adequate DC electrical power is provided to mitigate events C. postulated during shutdown, such as a fuel handling accident. The DC sources satisfy Criterion 3 of the NRC Policy Statement. LCO The DC electrical power subsystems, each subsystem consisting of two batteries, one battery charger per battery, and the corresponding control equipment and interconnecting cabling within the trainsubsystem, are required to be OPERABLE to support required subsystems trains of the distribution systems required OPERABLE by LCO 3.8.10, "Distribution Systems Shutdown." This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents).

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#### **APPLICABILITY**

The DC electrical power sources required to be OPERABLE in MODES 5 and 6 and during movement of irradiated fuel assemblies, provide assurance that:

- a. Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core:
- b. Required features needed to mitigate a fuel handling accident are available;
- c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.4.

#### **ACTIONS**

## A.1, A.2, and A.3

-----REVIEWER'S NOTE-----

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both subsystems of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one subsystem of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as ACTION A.

Condition A represents one subsystem with one [or two] battery charger[s] inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

# ------REVIEWER'S NOTE------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

#### 

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

# BA.1, BA.2.1, BA.2.2, BA.2.3, and BA.2.4

If two trains subsystems are required by LCO 3.8.10, the remaining train subsystem with DC power available may be capable of supporting sufficient systems to allow continuation of CORE ALTERATIONS and fuel movement. By allowing the option to declare required features inoperable with the associated DC power source(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO ACTIONS. In many instances this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions). The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystems and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the unit safety systems.

# ACTIONS (continued)

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

# SURVEILLANCE REQUIREMENTS

# SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.38. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

# REFERENCES

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [14].

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

# B 3.8.6 Battery Cell-Parameters

#### **BASES**

#### **BACKGROUND**

This LCO delineates the limits on <u>battery float current as well as</u> electrolyte temperature, level, <u>and</u> float voltage, <u>and specific gravity</u> for the DC power <u>subsystem source</u>-batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown." <u>In addition to the limitations of this Specification, the</u> [licensee controlled program] also implements a program specified in Specification 5.5.17 for monitoring various battery parameters.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 34) and Chapter [15] (Ref. 42), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one <a href="trainsubsystem">trainsubsystem</a> of DC sources OPERABLE during accident conditions, in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst-case single failure.

Battery cell-parameters satisfy Criterion 3 of the NRC Policy Statement.

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#### LCO

Battery cell-parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Battery parameter Electrolyte-limits are conservatively established, allowing continued DC electrical system function even with Category A and B-limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.17.

## **APPLICABILITY**

The battery cell-parameters are required solely for the support of the associated DC electrical power subsystems. Therefore, battery electrolyte-parameter limits are is only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.4 and LCO 3.8.5.

## **ACTIONS**

#### A.1. A.2. and A.3

With one or more cells in one or more batteries not within limits (i.e., Category A limits not met or Category B limits not met or Category A and B limits not met) but within the Category C limits specified in Table 3.8.6-1 in the accompanying LCO, the battery is degraded but there is still sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of Category A or B limits not met, and continued operation is permitted for a limited period.

The pilot cell electrolyte level and float voltage are required to be verified to meet the Category C limits within 1 hour (Required Action A.1). This check will provide a quick indication of the status of the remainder of the battery cells. One hour provides time to inspect the electrolyte level and to confirm the float voltage of the pilot cells. One hour is considered a reasonable amount of time to perform the required verification.

Verification that the Category C limits are met (Required Action A.2) provides assurance that during the time needed to restore the parameters to the Category A and B limits, the battery will still be capable of performing its intended function. A period of 24 hours is allowed to complete the initial verification because specific gravity measurements must be obtained for each connected cell. Taking into consideration both the time required to perform the required verification and the assurance that the battery cell parameters are not severely degraded, this time is considered reasonable. The verification is repeated at 7 day intervals until the parameters are restored to Category A and B limits. This periodic verification is consistent with the normal Frequency of pilot cell Surveillances.

Continued operation is only permitted for 31 days before battery cell parameters must be restored to within Category A and B limits. With the consideration that, while battery capacity is degraded, sufficient capacity exists to perform the intended function and to allow time to fully restore the battery cell parameters to normal limits, this time is acceptable prior to declaring the battery inoperable.

# A.1, A.2, and A.3

With one or more cells in one or more batteries in one subsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function.

Therefore, the affected battery is not required to be considered inoperable solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

## B.1 and B.2

One or more batteries in one subsystem with float current > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "OR" statement in Condition F is applicable and the battery must be declared inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action B.2) from any discharge that might have occurred due to a temporary loss of the battery charger.

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to

<u>2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test</u> (SR 3.8.4.3).

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

# C.1, C.2, and C.3

With one or more batteries in one subsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.17, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.17.b item to initiate action to equalize and test in accordance with manufacturer's recommendation. They are performed following the restoration of the

electrolyte level to above the top of the plates. Based on the results of the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

#### D.1

With one or more batteries in one subsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

# <u>E.1</u>

With one or more batteries in redundant subsystem's with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one subsystem within 2 hours.

## FB.1

With one or more batteries with <u>any one or more</u> battery <u>cell-parameters</u> outside the <u>allowances of the Required Actions for Condition A, B, C, D, or E, Category C limit for any connected cell, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding <u>battery DC electrical power subsystem</u>-must be declared inoperable. Additionally, <u>discovering one or more batteries in one</u> subsystem with one or more battery cells float voltage less than [2.07] V and float current greater than [2] amps indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately other potentially extreme conditions, such as not</u>

# ACTIONS (continued)

completing the Required Actions of Condition A within the required Completion Time or average electrolyte temperature of representative cells falling below 60°F, are also cause for immediately declaring the associated DC electrical power subsystem inoperable.

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The equipment used to monitor float current must have the necessary accuracy and capability to measure electrical currents in the expected range. The float current requirements are based on the float current indicative of a charged battery. The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

#### SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge, which could eventually render the battery inoperable. Float voltages in this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.17. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

## SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The minimum design electrolyte level is the minimum level indication mark on the battery cell jar. The Frequency is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provide the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

# SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's ratings. Degradation is indicated, according to IEEE-450 (Ref. 1), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is  $\geq$  [10%] below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

This SR verifies that Category A battery cell parameters are consistent with IEEE-450 (Ref. 3), which recommends regular battery inspections (at least one per month) including voltage, specific gravity, and electrolyte temperature of pilot cells.

#### SR 3.8.6.2

The quarterly inspection of specific gravity and voltage is consistent with IEEE-450 (Ref. 3). In addition, within 24 hours of a battery discharge < [110] V or a battery overcharge > [150] V, the battery must be demonstrated to meet Category B limits. Transients, such as motor starting transients, which may momentarily cause battery voltage to drop to ≤ [110] V, do not constitute a battery discharge provided battery terminal voltage and float current return to pre-transient values. This inspection is also consistent with IEEE-450 (Ref. 3), which recommends special inspections following a severe discharge or overcharge, to ensure that no significant degradation of the battery occurs as a consequence of such discharge or overcharge.

#### SR 3.8.6.3

This Surveillance verification that the average temperature of

Battery Cell-Parameters B 3.8.6

representative cells is > [60]°F is consistent with a recommendation of IEEE-450 (Ref. 3), which states that the temperature of electrolytes in representative cells should be determined on a quarterly basis.

Lower than normal temperatures act to inhibit or reduce battery capacity. This SR ensures that the operating temperatures remain within an acceptable operating range. This limit is based on manufacturer recommendations.

# SURVEILLANCE REQUIREMENTS (continued)

# Table 3.8.6-1

This table delineates the limits on electrolyte level, float voltage, and specific gravity for three different categories. The meaning of each category is discussed below.

Category A defines the normal parameter limit for each designated pilot cell in each battery. The cells selected as pilot cells are those whose temperature, voltage and electrolyte specific gravity approximate the state of charge of the entire battery.

The Category A limits specified for electrolyte level are based on manufacturer recommendations and are consistent with the guidance in IEEE-450 (Ref. 3), with the extra ½ inch allowance above the high water level indication for operating margin to account for temperatures and charge effects. In addition to this allowance, footnote a to Table 3.8.6-1 permits the electrolyte level to be above the specified maximum level during equalizing charge, provided it is not overflowing. These limits ensure that the plates suffer no physical damage and that adequate electron transfer capability is maintained in the event of transient conditions. IEEE-450 (Ref. 3) recommends that electrolyte level readings should be made only after the battery has been at float charge for at least 72 hours.

The Category A limit specified for float voltage is ≥ 2.13 V per cell. This value is based on a recommendation of IEEE-450 (Ref. 3), which states that prolonged operation of cells < 2.13 V can reduce the life expectancy of cells.

The Category A limit specified for specific gravity for each pilot cell is ≥ [1.200] (0.015 below the manufacturer fully charged nominal specific gravity or a battery charging current that had stabilized at a low value). This value is characteristic of a charged cell with adequate capacity. According to IEEE 450 (Ref. 3), the specific gravity readings are based on a temperature of 77°F (25°C).

The specific gravity readings are corrected for actual electrolyte temperature and level. For each 3°F (1.67°C) above 77°F (25°C), 1 point (0.001) is added to the reading; 1 point is subtracted for each 3°F below 77°F. The specific gravity of the electrolyte in a cell increases with a loss of water due to electrolysis or evaporation.

Category B defines the normal parameter limits for each connected cell.

The term "connected cell" excludes any battery cell that may be jumpered out.

# SURVEILLANCE REQUIREMENTS (continued)

The Category B limits specified for electrolyte level and float voltage are the same as those specified for Category A and have been discussed above. The Category B limit specified for specific gravity for each connected cell is ≥ [1.195] (0.020 below the manufacturer fully charged, nominal specific gravity) with the average of all connected cells > [1.205] (0.010 below the manufacturer fully charged, nominal specific gravity). These values are based on manufacturer's recommendations. The minimum specific gravity value required for each cell ensures that the effects of a highly charged or newly installed cell will not mask overall degradation of the battery.

Category C defines the limits for each connected cell. These values, although reduced, provide assurance that sufficient capacity exists to perform the intended function and maintain a margin of safety. When any battery parameter is outside the Category C limits, the assurance of sufficient capacity described above no longer exists and the battery must be declared inoperable.

The Category C limits specified for electrolyte level (above the top of the plates and not overflowing) ensure that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C limits for float voltage is based on IEEE-450 (Ref. 3), which states that a cell voltage of 2.07 V or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limits of average specific gravity ≥ [1.195] is based on manufacturer recommendations (0.020 below the manufacturer recommended fully charged, nominal specific gravity). In addition to that limit, it is required that the specific gravity for each connected cell must be no less than 0.020 below the average of all connected cells. This limit ensures that the effect of a highly charged or new cell does not mask overall degradation of the battery.

The footnotes to Table 3.8.6-1 are applicable to Category A, B, and C specific gravity. Footnote (b) to Table 3.8.6-1 requires the above mentioned correction for electrolyte level and temperature, with the exception that level correction is not required when battery charging current is < [2] amps on float charge. This current provides, in general, an indication of overall battery condition.

Because of specific gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger current is an acceptable alternative to specific gravity measurement for determining the

# SURVEILLANCE REQUIREMENTS (continued)

state of charge. This phenomenon is discussed in IEEE-450 (Ref. 3). Footnote (c) to Table 3.8.6-1 allows the float charge current to be used as an alternate to specific gravity for up to [7] days following a battery recharge. Within [7] days each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less that [7] days.

[Reviewer's Note: The value of [2] amps used in footnote (b) and (c) is the nominal value for float current established by the battery vendor as representing a fully charged battery with an allowance for overall battery condition.]

| REFERENCES | 1. IEEE-450.                   |
|------------|--------------------------------|
|            | 2. FSAR, Chapter 8.            |
|            | 34. FSAR, Chapter [6].         |
|            | 42. FSAR, Chapter [15].        |
|            | 3. IEEE-450-[1980].            |
|            | 5. IEEE-485-[1983], June 1983. |

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.4 DC Sources - Operating

LCO 3.8.4 The Train A and Train B DC electrical power subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

# **ACTIONS**

| CONDITION                                                                                 |                      | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|-------------------------------------------------------------------------------------------|----------------------|-----------------------------------------------------------------------------------------------------|---------------------|
| A. One [or two] battery charger[s] on one subsystem inoperable.                           | <u>A.1</u>           | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
|                                                                                           | <u>AND</u>           |                                                                                                     |                     |
|                                                                                           | A.2                  | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
|                                                                                           | AND                  |                                                                                                     |                     |
|                                                                                           | <u>A.3</u>           | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours          |
| [B. One [or two] batter[y][ies on one subsystem] inoperable.                              | <u>B.1</u>           | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours ]         |
| CA.One DC electrical power subsystem inoperable for reasons other than Condition A [or B] | <u>C</u> A.1         | Restore DC electrical power subsystem to OPERABLE status.                                           | [2] hours           |
| DB. Required Action and                                                                   | <u>D</u> B.1         | Be in MODE 3.                                                                                       | 6 hours             |
| Associated Completion<br>Time not met.                                                    | AND                  |                                                                                                     |                     |
|                                                                                           | <u>D</u> <b>B</b> .2 | Be in MODE 5.                                                                                       | 36 hours            |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                                 | FREQUENCY |   |
|------------|------------------------------------------------------------------------------------------------------------------------------|-----------|---|
| SR 3.8.4.1 | Verify battery terminal voltage is ≥ [129] V on float charge greater than or equal to the minimum established float voltage. | 7 days    | - |

|                        | SURVEILLANCE                                                                                                                                                                                                    | FREQUENCY          |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| SR 3.8.4.2             | Verify no visible corrosion at battery terminals and connectors.                                                                                                                                                | <del>92 days</del> |
|                        | <del>OR</del>                                                                                                                                                                                                   |                    |
|                        | Verify battery connection resistance [is ≤ [1E-5 ohm] for inter-cell connections, ≤ [1E-5 ohm] for inter-rack connections, ≤ [1E-5 ohm] for inter-tier connections, and ≤ [1E-5 ohm] for terminal connections]. |                    |
| SR 3.8.4.3             | Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration.                                                                                            | [12] months        |
| SR 3.8.4.4             | Remove visible terminal corrosion, verify battery cell to cell and terminal connections are clean and tight, and are coated with anti-corrosion material.                                                       | [12] months        |
| SR 3.8.4.5             | Verify battery connection resistance [is ≤ [1E-5 ohm] for inter-cell connections, ≤ [1E-5 ohm] for inter-rack connections, ≤ [1E-5 ohm] for inter-tier connections, and ≤ [1E-5 ohm] for terminal connections]. | [12] months        |
| SR 3.8.4. <u>2</u> 6 - | NOTE  This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.                                                                   |                    |
|                        | —Verify each battery charger supplies ≥ [400] amps at greater than or equal to the minimum established float voltage ≥ [125] V for ≥ [8] hours.                                                                 | [18 months]        |
|                        | Verify each battery charger can recharge the battery to the fully charged state within [24] hours while supplying the largest combined demands of the various continuous steady state loads, after a            |                    |

| battery discharge to the bounding design basis |  |
|------------------------------------------------|--|
| event discharge state.                         |  |

|                      | SURVEILLANCE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | FREQUENCY   |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| SR 3.8.4. <u>3</u> 7 | <ol> <li>The modified performance discharge test in SR 3.8.6.64.8 may be performed in lieu of the service test in SR 3.8.4.37 once per 60 months.</li> <li>This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.</li> <li>Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.</li> </ol> | [18 months] |

|            | SURVEILLANCE                                                                                                                                             | FREQUENCY                                                                                                                                                                                                                                                      |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.4.8 | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.                  |                                                                                                                                                                                                                                                                |
|            | Verify battery capacity is ≥ [80]% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | 60 months  AND  12 months when battery shows degradation or has reached [85]% of expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating |

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.5 DC Sources - Shutdown

LCO 3.8.5 DC electrical power subsystem shall be OPERABLE to support the DC

electrical power distribution subsystem(s) required by LCO 3.8.10,

"Distribution Systems — Shutdown."

APPLICABILITY: MODES 5 and 6,

During movement of irradiated fuel assemblies.

# **ACTIONS**

| CONDITION                                                                                                            | REQUIRED ACTION                                                                                              | COMPLETION TIME     |
|----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|---------------------|
| <ul><li>[A. One [or two] battery charger[s on one subsystem] inoperable.</li><li>AND</li><li>The redundant</li></ul> | A.1 Restore battery terminal voltage to greater than or equal to the minimum established float voltage.  AND | 2 hours             |
| subsystem battery and charger[s] OPERABLE.                                                                           | A.2 Verify battery float current ≤ [2] amps.  AND                                                            | Once per [12] hours |
|                                                                                                                      | A.3 Restore battery charger[s] to OPERABLE status.                                                           | [72] hours ]        |
| BA. One or more required DC electrical power subsystems inoperable.  [for reasons other than Condition A.]           | BA.1.1 Declare affected required feature(s) inoperable.  OR                                                  | Immediately         |
| OR                                                                                                                   | BA.1.2 Suspend CORE<br>ALTERATIONS.                                                                          | Immediately         |
| Required Actions and associated Completion Time of Condition A not met].                                             | AND  BA.2.2 Suspend movement of irradiated fuel assemblies.                                                  | Immediately         |
|                                                                                                                      | AND                                                                                                          |                     |

| CONDITION | REQUIRED ACTION                                                                               | COMPLETION TIME |
|-----------|-----------------------------------------------------------------------------------------------|-----------------|
|           | BA.2.3 Initiate action to suspend operations involving positive reactivity additions.         | Immediately     |
|           | AND                                                                                           |                 |
|           | BA.2.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status. | Immediately     |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                                                                                                                                                                           | FREQUENCY                               |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| SR 3.8.5.1 | The following SRs are not required to be performed: SR 3.8.4.26, and SR 3.8.4.37, and SR 3.8.4.8.  For DC sources required to be OPERABLE, the following SRs are applicable:  SR 3.8.4.1 SR 3.8.4.4 SR 3.8.4.7 SR 3.8.4.2 SR 3.8.4.5 SR 3.8.4.8. SR 3.8.4.3 SR 3.8.4.6 | In accordance<br>with applicable<br>SRs |

# 3.8 ELECTRICAL POWER SYSTEMS

#### Battery Cell-Parameters 3.8.6

Battery cell-parameters for Train A and Train B electrical power LCO 3.8.6

subsystem batteries shall be within the limits of Table 3.8.6-1.

When associated DC electrical power subsystems are required to be APPLICABILITY:

OPERABLE.

| ACTIONS                                               |
|-------------------------------------------------------|
| NOTENOTE                                              |
|                                                       |
| Separate Condition entry is allowed for each battery. |
|                                                       |

| CONDITION                                                                                            | REQUIRED ACTION                                                                                    | COMPLETION TIME                           |
|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-------------------------------------------|
| A. One or more batteries with one or more battery cell parameters not within Category A or B limits. | A.1 Verify pilot cell[s] electrolyte level and float voltage meet Table 3.8.6-1 Category C limits. | 1 hour                                    |
|                                                                                                      | A.2 Verify battery cell parameters meet Table 3.8.6-1 Category C limits.                           | 24 hours  AND  Once per 7 days thereafter |
|                                                                                                      | AND                                                                                                |                                           |
|                                                                                                      | A.3 Restore battery cell parameters to Category A and B limits of Table 3.8.6-1.                   | <del>31 days</del>                        |

# ACTIONS (continued)

| ACTIONS (continued)                                                                               | T                                                                                                         | T               |
|---------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|-----------------|
| CONDITION                                                                                         | REQUIRED ACTION                                                                                           | COMPLETION TIME |
| A. One [or two] batter[y][ies on one subsystem] with one or more battery cells                    | A.1 Perform SR 3.8.4.1.  AND                                                                              | 2 hours         |
| float voltage < [2.07] V.                                                                         | A.2 Perform SR 3.8.6.1.                                                                                   | 2 hours         |
|                                                                                                   | AND  A.3 Restore affected cell  voltage ≥ [2.07] V.                                                       | 24 hours        |
| B. One [or two] batter[y][ies on one subsystem] with float current > [2] amps.                    | B.1 Perform SR 3.8.4.1.  AND                                                                              | 2 hours         |
|                                                                                                   | B.2 Restore battery float current to ≤ [2] amps.                                                          | [12] hours      |
| Required Action C.2 shall be completed if electrolyte level was below the top of plates.          | Required Actions C.1 and C.2 are only applicable if electrolyte level was below the top of plates.        |                 |
| C. One [or two] batter[y][ies on one subsystem] with one or more cells                            | C.1 Restore electrolyte level to above top of plates.                                                     | 8 hours         |
| electrolyte level less<br>than minimum<br>established design<br>limits.                           | AND  C.2 Verify no evidence of leakage.                                                                   | 12 hours        |
|                                                                                                   | AND                                                                                                       |                 |
|                                                                                                   | C.3 Restore electrolyte level to greater than or equal to minimum established design limits.              | <u>31 days</u>  |
| D. One [or two] batter[y][ies on one subsystem] with pilot cell electrolyte temperature less than | D.1 Restore battery pilot cell temperature to greater than or equal to minimum established design limits. | 12 hours        |

|                                                                                                                                                                                                                                       | ı            |                                                                             |                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------|-----------------|
| CONDITION                                                                                                                                                                                                                             |              | REQUIRED ACTION                                                             | COMPLETION TIME |
| minimum established design limits.                                                                                                                                                                                                    |              |                                                                             |                 |
| E. One or more batteries in redundant subsystems with battery parameters not within limits.                                                                                                                                           | <u>E.1</u>   | Restore battery parameters for batteries in one subsystem to within limits. | 2 hours         |
| FB. Required Action and associated Completion Time of Condition A, B, C, D, or E not met.                                                                                                                                             | <u>F</u> B.1 | Declare associated battery inoperable.                                      | Immediately     |
| <u>OR</u>                                                                                                                                                                                                                             |              |                                                                             |                 |
| One [or two] batter[y][ies on one subsystems] with one or more battery cells float voltage < [2.07] V and float current > [2] amps.  One or more batteries with average electrolyte temperature of the representative cells < [60]°F. |              |                                                                             |                 |
| One or more batteries     with one or more battery     cell parameters not                                                                                                                                                            |              |                                                                             |                 |
| within Category C<br>values.                                                                                                                                                                                                          |              |                                                                             |                 |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                         | FREQUENCY         |
|------------|----------------------------------------------------------------------|-------------------|
| SR 3.8.6.1 | Verify battery cell parameters meet Table 3.8.6-1 Category A limits. | <del>7 days</del> |

|            | SURVEILLANCE                                                                                                           | FREQUENCY                                                                                                                              |
|------------|------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.2 | Verify battery cell parameters meet Table 3.8.6-1 Category B limits.                                                   | 92 days  AND  Once within 24 hours after a battery discharge < [110] V  AND  Once within 24 hours after a battery evercharge > [150] V |
| SR 3.8.6.3 | Verify average electrolyte temperature of representative cells is ≥ [60]°F.                                            | <del>92 days</del>                                                                                                                     |
| SR 3.8.6.1 | Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. | 7 days                                                                                                                                 |
|            | Verify each battery float current is ≤ [2] amps.                                                                       | 7 days                                                                                                                                 |
| SR 3.8.6.2 | Verify each battery pilot cell float voltage is ≥ [2.07] V.                                                            | <u>31 days</u>                                                                                                                         |
| SR 3.8.6.3 | Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.    | 31 days                                                                                                                                |
| SR 3.8.6.4 | Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.              | 31 days                                                                                                                                |
| SR 3.8.6.5 | Verify each battery connected cell float voltage is ≥ [2.07] V.                                                        | 92 days                                                                                                                                |
|            |                                                                                                                        |                                                                                                                                        |

|            |                                                                                                                                                          | <del></del>                                                                                                                                                                                                                                              |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.6 | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.                  |                                                                                                                                                                                                                                                          |
|            | Verify battery capacity is ≥ [80%] of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | AND  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating |

# Table 3.8.6-1 (page 1 of 1) Battery Cell Parameter Requirements

| PARAMETER               | CATEGORY A: LIMITS FOR EACH DESIGNATED PILOT CELL                                    | CATEGORY B:<br>LIMITS FOR EACH<br>CONNECTED CELL                                     | CATEGORY C:<br>ALLOWABLE<br>LIMITS FOR<br>EACH<br>CONNECTED<br>CELL                                     |
|-------------------------|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Electrolyte Level       | ➤ Minimum level indication mark, and ≤ ¼ inch above maximum level indication mark(a) | ➤ Minimum level indication mark, and ≤ ¼ inch above maximum level indication mark(a) | Above top of plates, and not overflowing                                                                |
| Float Voltage           | ≥ 2.13 V                                                                             | ≥ <del>2.13 V</del>                                                                  | > 2.07 V                                                                                                |
| Specific Gravity (b)(c) | <u>≥ [1.200]</u>                                                                     | ≥ [1.195]  AND  Average of all connected cells > [1.205]                             | Not more than 0.020 below average of all connected cells  AND  Average of all connected cells ≥ [1.195] |

- (a) It is acceptable for the electrolyte level to temporarily increase above the specified maximum during equalizing charges provided it is not overflowing.
  - (b) Corrected for electrolyte temperature and level. Level correction is not required, however, when battery charging is < [2] amps when on float charge.
- (c) A battery charging current of < [2] amps when on float charge is acceptable for meeting specific gravity limits following a battery recharge, for a maximum of [7] days. When charging current is used to satisfy specific gravity requirements, specific gravity of each connected cell shall be measured prior to expiration of the [7] day allowance.

# 5.5 Programs and Manuals

| 5.5.17 | Battery Monitoring and Maintenance Program                                                                                     |  |
|--------|--------------------------------------------------------------------------------------------------------------------------------|--|
|        | This Program provides for battery restoration and maintenance, which includes the following:                                   |  |
|        | a. Actions to restore battery cells with float voltage < [2.13] V;                                                             |  |
|        | b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plates; and |  |
|        | c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.      |  |

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### BACKGROUND

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment and preferred AC vital bus power (via inverters). As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the recommendations of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The [125/250] VDC electrical power system consists of two independent and redundant safety related Class 1E DC electrical power subsystems ([Train A and Train B]). Each subsystem consists of [two] 125 VDC batteries [(each battery [50]% capacity)], the associated battery charger(s) for each battery, and all the associated control equipment and interconnecting cabling.

[ The 250 VDC source is obtained by use of the two 125 VDC batteries connected in series. Additionally there is [one] spare battery charger per subsystem, which provides backup service in the event that the preferred battery charger is out of service. If the spare battery charger is substituted for one of the preferred battery chargers, then the requirements of independence and redundancy between subsystems are maintained. I

During normal operation, the [125/250] VDC load is powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC load is automatically powered from the station batteries.

The [Train A and Train B] DC electrical power subsystems provide the control power for its associated Class 1E AC power load group, [4.16] kV switchgear, and [480] V load centers. The DC electrical power subsystems also provide DC electrical power to the inverters, which in turn power the AC vital buses.

The DC power distribution system is described in more detail in Bases for LCO 3.8.9, "Distribution System — Operating," and LCO 3.8.10, "Distribution Systems — Shutdown."

# BACKGROUND (continued)

Each battery has adequate storage capacity to carry the required load continuously for at least 2 hours and to perform three complete cycles of intermittent loads discussed in the FSAR, Chapter [8] (Ref. 4).

Each 125 VDC battery is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystem to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [There is no sharing between redundant Class 1E subsystems, such as batteries, battery chargers, or distribution panels.]

Each battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for Train A and Train B DC electrical power subsystems are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The minimum design voltage limit is [105/210] V. Battery size is based on 125% of required capacity and, after selection of an available commercial battery, results in a battery capacity in excess of 150% of required capacity. The voltage limit is 2.13 V per cell, which corresponds to a total minimum voltage output of 128 V per battery discussed in the FSAR, Chapter [8] (Ref. 4). The criteria for sizing large lead storage batteries are defined in IEEE-485 (Ref. 5).

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each Train A and Train B DC electrical power subsystem <u>battery charger</u> has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger also has sufficient <u>excess</u> capacity to restore the battery from the design minimum

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charge to its fully charged state within [24] hours while supplying normal steady state loads discussed in the FSAR, Chapter [8] (Ref. 4).

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance.

Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

APPLICABLE SAFETY ANALYSES The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 56), and in the FSAR, Chapter [15] (Ref. 67), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC sources is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining the DC sources OPERABLE during accident conditions in the event of:

# APPLICABLE SAFETY ANALYSES (continued)

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst-case single failure.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

#### LCO

The DC electrical power subsystems, each subsystem consisting of [two] batteries, battery charger [for each battery] and the corresponding control equipment and interconnecting cabling supplying power to the associated bus within the <u>train subsystem</u> are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any <u>train-DC</u> electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4).

An OPERABLE DC electrical power subsystem requires all required batteries and respective chargers to be operating and connected to the associated DC bus(es).

#### **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure safe unit operation and to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 5 and 6 are addressed in the Bases for LCO 3.8.5, "DC Sources — Shutdown."

#### **ACTIONS**

#### A.1. A.2. and A.3

Condition A represents one subsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring

the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

#### -----REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

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A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it is now fully capable of supplying the maximum expected load requirement. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

## ----REVIEWER'S NOTE----

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, the 7 day Completion Time can be justified by an acceptable alternate method, such as a regulatory commitment that an means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a

reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

B.1

## -----REVIEWER'S NOTES------

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications."
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one division] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one subsystem with one [or two] batter[y][ies] inoperable. With one [or two] batter[y][ies] inoperable, the DC bus is being supplied by the OPERABLE battery charger[s]. Any event that results in a loss of the AC bus supporting the battery charger[s] will also result in loss of DC to that subsystem. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the

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fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[y][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[y][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific Completion Times.

#### CA.1

Condition <u>CA</u> represents one <u>train-subsystem</u> with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is, therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected <u>trainsubsystem</u>. The 2 hour limit is consistent with the allowed time for an inoperable DC distribution <u>sub</u>system<u>-train</u>.

## ACTIONS (continued)

If one of the required DC electrical power subsystems is inoperable for reasons other than Condition A or B (e.g., inoperable battery, inoperable battery charger(s), or inoperable battery charger and associated inoperable battery), the remaining DC electrical power subsystem has the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure wouldcould, however, result in the complete loss of the minimum necessary DC electrical subsystems to mitigate a worst case accident, the remaining 125 VDC electrical power subsystems with attendant loss of ESF functions, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 78) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

## DB.1 and DB.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 5 is consistent with the time required in Regulatory Guide 1.93 (Ref. 78).

## SURVEILLANCE REQUIREMENTS

## SR 3.8.4.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the battery chargers, which support the ability of the batteries to perform their intended function-charging system and the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery (or battery cell) and maintain the battery (or a battery cell) in a fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life. The

voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The 7 day Frequency is consistent with manufacturer recommendations and IEEE-450 (Ref. 9).

## SURVEILLANCE REQUIREMENTS (continued)

## SR 3.8.4.2

Visual inspection to detect corrosion of the battery cells and connections, or measurement of the resistance of each intercell, interrack, intertier, and terminal connection, provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

The limits established for this SR must be no more than 20% above the resistance as measured during installation or not above the ceiling value established by the manufacturer.

The Surveillance Frequency for these inspections, which can detect conditions that can cause power losses due to resistance heating, is 92 days. This Frequency is considered acceptable based on operating experience related to detecting corrosion trends.

## SR 3.8.4.3

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

[The 12 month Frequency for this SR is consistent with IEEE-450 (Ref. 9), which recommends detailed visual inspection of cell condition and rack integrity on a yearly basis.]

#### SR 3.8.4.4 and SR 3.8.4.5

Visual inspection and resistance measurements of intercell, interrack, intertier, and terminal connections provide an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The anticorrosion material is used to help ensure good electrical connections and to reduce terminal deterioration. The visual inspection for corrosion is not intended to require removal of and inspection under each terminal connection. The removal of visible corrosion is a preventive maintenance SR. The presence of visible corrosion does not necessarily represent a failure of this SR provided visible corrosion is removed during performance of SR 3.8.4.4.

## SURVEILLANCE REQUIREMENTS (continued)

Reviewer's Note: The requirement to verify that terminal connections are clean and tight applies only to nickel cadmium batteries as per IEEE Standard P1106, "IEEE Recommended Practice for Installation, Maintenance, Testing and Replacement of Vented Nickel - Cadmium Batteries for Stationary Applications." This requirement may be removed for lead acid batteries.

The connection resistance limits for SR 3.8.4.5 shall be no more than 20% above the resistance as measured during installation, or not above the ceiling value established by the manufacturer.

[The Surveillance Frequencies of 12 months is consistent with IEEE-450 (Ref. 9), which recommends cell to cell and terminal connection resistance measurement on a yearly basis.]

## SR 3.8.4.26

This SR verifies requires that each battery charger be capable of supplying [400] amps and [125] V for [8] hours. These requirements are based on the design capacity of the battery chargers (Ref. 4). According to Regulatory Guide 1.32 (Ref. 810), the battery charger supply is recommended required to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period is sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the battery service test and will need to be supplemented with additional loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage,

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temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is  $\leq$  [2] amps.

The Surveillance Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these [18 month] intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

This Surveillance is required to be performed during MODES 5 and 6 since it would require the DC electrical power subsystem to be inoperable during performance of the test.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

## SURVEILLANCE REQUIREMENTS (continued)

## SR 3.8.4.37

A battery service test is a special test of battery capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length should correspond to the design duty cycle requirements as specified in Reference 4.

The Surveillance Frequency of [18 months] is consistent with the recommendations of Regulatory Guide 1.32 (Ref. <u>8</u>10) and Regulatory Guide 1.129 (Ref. <u>9</u>11), which state that the battery service test should be performed during refueling operations or at some other outage, with intervals between tests, not to exceed [18 months].

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test once per 60 months.

The modified performance discharge test is a simulated duty cycle consisting of just two rates; the one minute rate published for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a rated one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test should remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

The reason for Note 2 is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

## SURVEILLANCE REQUIREMENTS (continued)

## SR 3.8.4.8

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

A battery modified performance discharge test is described in the Bases for SR 3.8.4.7. Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.4.8; however, only the modified performance discharge test may be used to satisfy SR 3.8.4.8 while satisfying the requirements of SR 3.8.4.7 at the same time.

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 9) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 9), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is  $\geq$  [10%] below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 9).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

| REFERENCES | 1.           | 10 CFR 50, Appendix A, GDC 17.         |  |
|------------|--------------|----------------------------------------|--|
|            | 2.           | Regulatory Guide 1.6, March 10, 1971.  |  |
|            | 3.           | IEEE-308-[1978].                       |  |
|            | 4.           | FSAR, Chapter [8].                     |  |
|            | <del>5</del> | IEEE-485-[1983], June 1983.            |  |
|            | <u>5</u> 6.  | FSAR, Chapter [6].                     |  |
|            | <u>6</u> 7.  | FSAR, Chapter [15].                    |  |
|            | <u>7</u> 8   | Regulatory Guide 1.93, December 1974.  |  |
|            | 9.           | IEEE-450-[1987].                       |  |
|            | <u>8</u> 10  | Regulatory Guide 1.32, February 1977.  |  |
|            | <u>9</u> 11. | Regulatory Guide 1.129, December 1974. |  |

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

#### B 3.8.5 DC Sources - Shutdown

#### **BASES**

## **BACKGROUND** A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating." APPLICABLE The initial conditions of Design Basis Accident and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [15] (Ref. 2), assume that SAFETY **ANALYSES** Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation. The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY. The OPERABILITY of the minimum DC electrical power sources during MODES 5 and 6 and during movement of irradiated fuel assemblies ensures that: The unit can be maintained in the shutdown or refueling condition a. for extended periods; Sufficient instrumentation and control capability is available for b. monitoring and maintaining the unit status; and Adequate DC electrical power is provided to mitigate events C. postulated during shutdown, such as a fuel handling accident. The DC sources satisfy Criterion 3 of the NRC Policy Statement. LCO The DC electrical power subsystems, each subsystem consisting of two batteries, one battery charger per battery, and the corresponding control equipment and interconnecting cabling within the trainsubsystem, are required to be OPERABLE to support required subsystemstrains of the distribution systems required OPERABLE by LCO 3.8.10, "Distribution Systems Shutdown." This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to

fuel handling accidents).

mitigate the consequences of postulated events during shutdown (e.g.,

#### **APPLICABILITY**

The DC electrical power sources required to be OPERABLE in MODES 5 and 6, and during movement of irradiated fuel assemblies, provide assurance that:

- a. Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core:
- b. Required features needed to mitigate a fuel handling accident are available;
- c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.4.

#### **ACTIONS**

## A.1, A.2, and A.3

-----REVIEWER'S NOTE-----

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both subsystems of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one subsystem of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as ACTION A.

Condition A represents one subsystem with one [or two] battery charger[s] inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

## ------REVIEWER'S NOTE------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

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Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

## BA.1, BA.2.1, BA.2.2, BA.2.3, and BA.2.4

If two <u>subsystemtrains</u> are required by LCO 3.8.10, the remaining <u>subsystemtrain</u> with DC power available may be capable of supporting sufficient systems to allow continuation of CORE ALTERATIONS and fuel movement. By allowing the option to declare required features inoperable with the associated DC power source(s) inoperable, appropriate restrictions will be

implemented in accordance with the affected required features LCO ACTIONS. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions). The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystems and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the unit safety systems.

## ACTIONS (continued)

The Completion Time of immediately is consistent with the required times or actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

## SURVEILLANCE REQUIREMENTS

## SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.38. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

## REFERENCES

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [15].

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

#### B 3.8.6 Battery Cell-Parameters

#### **BASES**

#### **BACKGROUND**

This LCO delineates the limits on battery float current as well as electrolyte temperature, level, and float voltage, and specific gravity for the DC power subsystem source batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources — Operating," and LCO 3.8.5, "DC Sources — Shutdown." In addition to the limitations of this Specification, the [licensee controlled program] also implements a program specified in Specification 5.5.17 for monitoring various battery parameters.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

## APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 34) and Chapter [15] (Ref. 42), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one <a href="trainsubsystem">trainsubsystem</a> of DC sources OPERABLE during accident conditions, in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst case single failure.

Battery cell-parameters satisfy the Criterion 3 of the NRC Policy Statement.

Battery Cell-Parameters B 3.8.6

#### LCO

Battery cell-parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Electrolyte Battery parameter limits are conservatively established, allowing continued DC electrical system function even with Category A and B-limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.17.

## **APPLICABILITY**

The battery cell-parameters are required solely for the support of the associated DC electrical power subsystems. Therefore, battery parameter limits are electrolyte is only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.4 and LCO 3.8.5.

## **ACTIONS**

## A.1, A.2, and A.3

With one or more cells in one or more batteries not within limits (i.e., Category A limits not met, Category B limits not met, or Category A and B limits not met) but within the Category C limits specified in Table 3.8.6-1 in the accompanying LCO, the battery is degraded but there is still sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of Category A or B limits not met and operation is permitted for a limited period.

The pilot cell electrolyte level and float voltage are required to be verified to meet the Category C limits within 1 hour (Required Action A.1). This check will provide a quick indication of the status of the remainder of the battery cells. One hour provides time to inspect the electrolyte level and to confirm the float voltage of the pilot cells. One hour is considered a reasonable amount of time to perform the required verification.

Verification that the Category C limits are met (Required Action A.2) provides assurance that during the time needed to restore the parameters to the Category A and B limits, the battery is still capable of performing its intended function. A period of 24 hours is allowed to complete the initial verification because specific gravity measurements must be obtained for each connected cell. Taking into consideration both the time required to perform the required verification and the assurance that the battery cell parameters are not severely degraded, this time is considered reasonable. The verification is repeated at 7 day intervals until the parameters are restored to Category A or B limits. This periodic verification is consistent with the normal Frequency of pilot cell Surveillances.

Continued operation is only permitted for 31 days before battery cell parameters must be restored to within Category A and B limits. With the consideration that, while battery capacity is degraded, sufficient capacity exists to perform the intended function and to allow time to fully restore the battery cell parameters to normal limits, this time is acceptable prior to declaring the battery inoperable.

## ACTIONS (continued)

## A.1, A.2, and A.3

With one or more cells in one or more batteries in one subsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

#### B.1 and B.2

One or more batteries in one subsystem with float current > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive. and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "OR" statement in Condition F is applicable and the battery must be declared

inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action B.2) from any discharge that might have occurred due to a temporary loss of the battery charger.

#### -----REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

## C.1, C.2, and C.3

With one or more batteries in one subsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.17, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the

plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.17.b item to initiate action to equalize and test in accordance with manufacturer's recommendation. They are performed following the restoration of the electrolyte level to above the top of the plates. Based on the results of the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

## **D.1**

With one or more batteries in one subsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

## <u>E.1</u>

With one or more batteries in redundant subsystem's with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one subsystem within 2 hours.

## FB.1

With one or more batteries with <u>any one or more</u> battery <u>cell</u> parameters outside the <u>allowances of the Required Actions for Condition A, B, C, D, or E, Category C limit for any connected cell, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding <u>battery DC electrical power subsystem</u> must be declared inoperable. Additionally, <u>discovering one or more batteries in one subsystem with one or more battery cells float voltage less than [2.07] V and float current greater than [2] amps indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately other potentially extreme conditions, such as not completing the Required Actions of Condition A within the required Completion Time or average electrolyte temperature of</u></u>

representative cells falling below 60°F, are also cause for immediately declaring the associated DC electrical power subsystem inoperable.

## SURVEILLANCE REQUIREMENTS

## SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The equipment used to monitor float current must have the necessary accuracy and capability to measure electrical currents in the expected range. The float current requirements are based on the float current indicative of a charged battery. The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

#### SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge, which could eventually render the battery inoperable. Float voltages in this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.17. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

## SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The minimum design electrolyte level is the minimum level indication mark on the battery cell jar. The Frequency is consistent with IEEE-450 (Ref. 1).

## SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provide the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

## SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's ratings. Degradation is indicated, according to IEEE-450 (Ref. 1), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is  $\geq$  [10%] below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

#### SR 3.8.6.1

This SR verifies that Category A battery cell parameters are consistent with IEEE-450 (Ref. 3), which recommends regular battery inspections (at least one per month) including voltage, specific gravity, and electrolyte temperature of pilot cells.

## SR 3.8.6.2

The quarterly inspection of specific gravity and voltage is consistent with IEEE-450 (Ref. 3). In addition, within 24 hours of a battery discharge < [110] V or a battery overcharge > [150] V, the battery must be demonstrated to meet Category B limits. Transients, such as motor starting transients, which may momentarily cause battery voltage to drop to ≤ [110] V, do not constitute a battery discharge provided the battery terminal voltage and float current return to pre-transient values. This inspection is also consistent with IEEE-450 (Ref. 3), which recommends special inspections following a severe discharge or overcharge, to ensure that no significant degradation of the battery occurs as a consequence of such discharge or overcharge.

#### SR 3.8.6.3

This Surveillance verification that the average temperature of representative cells is > 60°F, is consistent with a recommendation of IEEE-450 (Ref. 3), that states that the temperature of electrolytes in representative cells should be determined on a quarterly basis.

## SURVEILLANCE REQUIREMENTS (continued)

Lower than normal temperatures act to inhibit or reduce battery capacity. This SR ensures that the operating temperatures remain within an acceptable operating range. This limit is based on manufacturer recommendations.

## Table 3.8.6-1

This table delineates the limits on electrolyte level, float voltage, and specific gravity for three different categories. The meaning of each category is discussed below.

Category A defines the normal parameter limit for each designated pilot cell in each battery. The cells selected as pilot cells are those whose temperature, voltage, and electrolyte specific gravity approximate the state of charge of the entire battery.

The Category A limits specified for electrolyte level are based on manufacturer recommendations and are consistent with the guidance in IEEE-450 (Ref. 3), with the extra ½ inch allowance above the high water level indication for operating margin to account for temperatures and charge effects. In addition to this allowance, footnote a to Table 3.8.6-1 permits the electrolyte level to be above the specified maximum level during equalizing charge, provided it is not overflowing. These limits ensure that the plates suffer no physical damage, and that adequate electron transfer capability is maintained in the event of transient conditions. IEEE-450 (Ref. 3) recommends that electrolyte level readings should be made only after the battery has been at float charge for at least 72 hours.

The Category A limit specified for float voltage is ≥ 2.13 V per cell. This value is based on the recommendations of IEEE-450 (Ref. 3), which states that prolonged operation of cells < 2.13 V can reduce the life expectancy of cells.

The Category A limit specified for specific gravity for each pilot cell is ≥ [1.200] (0.015 below the manufacturer fully charged nominal specific gravity or a battery charging current that had stabilized at a low value). This value is characteristic of a charged cell with adequate capacity. According to IEEE 450 (Ref. 3), the specific gravity readings are based on a temperature of 77°F (25°C).

## SURVEILLANCE REQUIREMENTS (continued)

The specific gravity readings are corrected for actual electrolyte temperature and level. For each 3°F (1.67°C) above 77°F (25°C), 1 point (0.001) is added to the reading; 1 point is subtracted for each 3°F below 77°F. The specific gravity of the electrolyte in a cell increases with a loss of water due to electrolysis or evaporation.

Category B defines the normal parameter limits for each connected cell.

The term "connected cell" excludes any battery cell that may be jumpered out.

The Category B limits specified for electrolyte level and float voltage are the same as those specified for Category A and have been discussed above. The Category B limit specified for specific gravity for each connected cell is ≥ [1.195] (0.020 below the manufacturer fully charged, nominal specific gravity) with the average of all connected cells > [1.205] (0.010 below the manufacturer fully charged, nominal specific gravity). These values are based on manufacturer's recommendations. The minimum specific gravity value required for each cell ensures that the effects of a highly charged or newly installed cell will not mask overall degradation of the battery.

Category C defines the limits for each connected cell. These values, although reduced, provide assurance that sufficient capacity exists to perform the intended function and maintain a margin of safety. When any battery parameter is outside the Category C limits, the assurance of sufficient capacity described above no longer exists, and the battery must be declared inoperable.

The Category C limits specified for electrolyte level (above the top of the plates and not overflowing) ensure that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C limits for float voltage is based on IEEE-450 (Ref. 3), which states that a cell voltage of 2.07 V or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limit of average specific gravity ≥ 1.195 is based on manufacturer recommendations (0.020 below the manufacturer recommended fully charged, nominal specific gravity). In addition to that limit, it is required that the specific gravity for each connected cell must be no less than 0.020 below the average of all connected cells. This limit ensures that the effect of a highly charged or new cell does not mask overall degradation of the battery.

## SURVEILLANCE REQUIREMENTS (continued)

The footnotes to Table 3.8.6-1 are applicable to Category A, B, and C specific gravity. Footnote (b) to Table 3.8.6-1 requires the above mentioned correction for electrolyte level and temperature, with the exception that level correction is not required when battery charging current is < [2] amps on float charge. This current provides, in general, an indication of overall battery condition.

Because of specific gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger current is an acceptable alternative to specific gravity measurement for determining the state of charge. This phenomenon is discussed in IEEE-450 (Ref. 3). Footnote (c) to Table 3.8.6-1 allows the float charge current to be used as an alternate to specific gravity for up to [7] days following a battery recharge. Within [7] days, each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less than [7] days.

[Reviewer's Note: The value of [2] amps used in footnote (b) and (c) is the nominal value for float current established by the battery vendor as representing a fully charged battery with an allowance for overall battery condition.]

| REFERENCES | 1. IEEE-450.                   |
|------------|--------------------------------|
|            | 2. FSAR, Chapter 8.            |
|            | 43. FSAR, Chapter [6].         |
|            | 24. FSAR, Chapter [15].        |
|            | 3. IEEE-450-[1980].            |
|            | 5. IEEE-485-[1983], June 1983. |

## 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.4 DC Sources - Operating

LCO 3.8.4 The Train A and Train B DC electrical power subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

# **ACTIONS**

| CONDITION                                                                                  |              | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|--------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------|---------------------|
| A. One [or two] battery charger[s] on one subsystem inoperable.                            | <u>A.1</u>   | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
|                                                                                            | AND          |                                                                                                     |                     |
|                                                                                            | A.2          | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
|                                                                                            | AND          |                                                                                                     |                     |
|                                                                                            | <u>A.3</u>   | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours          |
| [B. One [or two] batter[y][ies on one subsystem] inoperable.                               | B.1          | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours ]         |
| CA.One DC electrical power subsystem inoperable for reasons other than Condition A [or B]. | <u>C</u> A.1 | Restore DC electrical power subsystem to OPERABLE status.                                           | [2] hours           |
| DB.Required Action and associated Completion                                               | <u>D</u> B.1 | Be in MODE 3.                                                                                       | 6 hours             |
| Time not met.                                                                              | <u>AND</u>   |                                                                                                     |                     |
|                                                                                            | <u>D</u> B.2 | Be in MODE 5.                                                                                       | 36 hours            |

## SURVEILLANCE REQUIREMENTS

|            |                                                                                                                                                               | 1         |
|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
|            | SURVEILLANCE                                                                                                                                                  | FREQUENCY |
| SR 3.8.4.1 | Verify battery terminal voltage is <u>greater than or</u> <u>equal to the minimum established float</u> <u>voltage</u> <u>≥ [129/258] V on float charge</u> . | 7 days    |

# SURVEILLANCE REQUIREMENTS (continued)

|                      | SURVEILLANCE                                                                                                                                                                                                                                                               | FREQUENCY          |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| SR 3.8.4.2           | Verify no visible corrosion at battery terminals and connectors.                                                                                                                                                                                                           | <del>92 days</del> |
|                      | <u>OR</u>                                                                                                                                                                                                                                                                  |                    |
|                      | Verify battery connection resistance [is ≤ [1E-5 ohm] for inter-cell connections, ≤ [1E-5 ohm] for inter-rack connections, ≤ [1E-5 ohm] for inter-tier connections, and ≤ [1E-5 ohm] for terminal connections].                                                            |                    |
| SR 3.8.4.3           | Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration.                                                                                                                                                       | [12] months        |
| SR 3.8.4.4           | Remove visible terminal corrosion and verify battery cell to cell and terminal connections are [clean and tight, and are] coated with anti-corrosion material.                                                                                                             | [12] months        |
| SR 3.8.4.5           | Verify battery connection resistance [is ≤ [1E-5 ohm] for inter-cell connections ≤ [1E-5 ohm] for inter-rack connections, ≤ [1E-5 ohm] for inter-tier connections, and ≤ [1E-5 ohm] for terminal connections].                                                             | [12] months        |
| SR 3.8.4. <u>2</u> 6 |                                                                                                                                                                                                                                                                            |                    |
|                      | Verify each battery charger supplies ≥ [400] amps at greater than or equal to the minimum established float voltage ≥ [125/250] V for ≥ [8] hours.  OR                                                                                                                     | [18 months]        |
|                      | Verify each battery charger can recharge the battery to the fully charged state within [24] hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis event discharge state. |                    |

# SURVEILLANCE REQUIREMENTS (continued)

|                      | SURVEILLANCE                                                                                                                                                                                                                                                                                                  | FREQUENCY |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| SR 3.8.4. <u>3</u> 7 | <ol> <li>The modified performance discharge test in SR 3.8.6.64.8 may be performed in lieu of the service test in SR 3.8.4.37 once per 60 months.</li> <li>This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.</li> </ol> |           |
|                      | Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.                                                                                                                              |           |

# SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE |                                                                                                                                                          | FREQUENCY                                                                                                                                                                                                                                        |
|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.4.8   | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.                  | 60 months                                                                                                                                                                                                                                        |
|              | Verify battery capacity is ≥ [80]% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | AND  12 months when battery shows degradation or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's |

## 3.8 ELECTRICAL POWER SYSTEMS

## 3.8.5 DC Sources - Shutdown

LCO 3.8.5 DC electrical power subsystem shall be OPERABLE to support the DC

electrical power distribution subsystem(s) required by LCO 3.8.10,

"Distribution Systems - Shutdown."

APPLICABILITY: MODES 5 and 6,

During movement of irradiated fuel assemblies.

# **ACTIONS**

| CONDITION                                                                                                                       | REQUIRED ACTION                                                                                                                                                 | COMPLETION TIME              |
|---------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| [A. One [or two] battery charger[s on one subsystem] inoperable.  AND  The redundant subsystem battery and charger[s] OPERABLE. | A.1 Restore battery terminal voltage to greater than or equal to the minimum established float voltage.  AND  A.2 Verify battery float current ≤ [2] amps.  AND | 2 hours  Once per [12] hours |
|                                                                                                                                 | A.3 Restore battery charger[s] to OPERABLE status.                                                                                                              | [72] hours ]                 |
| BA. One or more required  DC electrical power subsystems inoperable- [for reasons other than Condition A.]                      | BA.1 Declare affected required feature(s) inoperable.  OR                                                                                                       | Immediately                  |
| OR                                                                                                                              | BA.2.1 Suspend CORE ALTERATIONS.                                                                                                                                | Immediately                  |
| Required Actions and associated Completion Time of Condition A not met].                                                        | AND  BA.2.2 Suspend movement of irradiated fuel assemblies.                                                                                                     | Immediately                  |
|                                                                                                                                 | AND                                                                                                                                                             |                              |

| CONDITION | REQUIRED ACTION                                                                               | COMPLETION TIME |
|-----------|-----------------------------------------------------------------------------------------------|-----------------|
|           | BA.2.3 Initiate action to suspend operations involving positive reactivity additions.         | Immediately     |
|           | AND                                                                                           |                 |
|           | BA.2.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status. | Immediately     |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                                                                                                                                                                             | FREQUENCY                               |
|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| SR 3.8.5.1 | The following SRs are not required to be performed: SR 3.8.4.26, and SR 3.8.4.37, and SR 3.8.4.8.  For DC sources required to be OPERABLE, the following SRs are applicable:  SR 3.8.4.1 SR 3.8.4.4 SR 3.8.4.7  SR 3.8.4.2 SR 3.8.4.5 SR 3.8.4.8.  SR 3.8.4.3 SR 3.8.4.6 | In accordance<br>with applicable<br>SRs |

#### 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.6 Battery Cell Parameters

LCO 3.8.6 Battery cell parameters for the Train A and Train B electrical power

subsystem batteries shall be within the limits of Table 3.8.6-1.

APPLICABILITY: When associated DC electrical power subsystems are required to be

OPERABLE.

| AC٦ | ΠO | NS |
|-----|----|----|
|-----|----|----|

-----NOTE-----

Separate Condition entry is allowed for each battery.

| CONDITION                                                                                            | REQUIRED ACTION                                                                                    | COMPLETION TIME                           |
|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-------------------------------------------|
| A. One or more batteries with one or more battery cell parameters not within Category A or B limits. | A.1 Verify pilot cell[s] electrolyte level and float voltage meet Table 3.8.6-1 Category C limits. | <del>1 hour</del>                         |
|                                                                                                      | A.2 Verify battery cell parameters meet Table 3.8.6-1 Category C limits.                           | 24 hours  AND  Once per 7 days thereafter |
|                                                                                                      | AND                                                                                                |                                           |
|                                                                                                      | A.3 Restore battery cell parameters to Category A and B limits of Table 3.8.6-1.                   | <del>31 days</del>                        |

# ACTIONS (continued)

| ACTIONS (continued)                                                                               | Т                                                                                                         | Τ               |
|---------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|-----------------|
| CONDITION                                                                                         | REQUIRED ACTION                                                                                           | COMPLETION TIME |
| A. One [or two] batter[y][ies on one subsystem] with one or more battery cells                    | A.1 Perform SR 3.8.4.1.  AND                                                                              | 2 hours         |
| float voltage < [2.07] V.                                                                         | A.2 Perform SR 3.8.6.1.                                                                                   | 2 hours         |
|                                                                                                   | AND  A.3 Restore affected cell  voltage ≥ [2.07] V.                                                       | 24 hours        |
| B. One [or two] batter[y][ies on one subsystem] with float current > [2] amps.                    | B.1 Perform SR 3.8.4.1.  AND                                                                              | 2 hours         |
|                                                                                                   | B.2 Restore battery float current to ≤ [2] amps.                                                          | [12] hours      |
| Required Action C.2 shall be completed if electrolyte level was below the top of plates.          | Required Actions C.1 and C.2 are only applicable if electrolyte level was below the top of plates.        |                 |
| C. One [or two] batter[y][ies on one subsystem] with one or more cells                            | C.1 Restore electrolyte level to above top of plates.                                                     | 8 hours         |
| electrolyte level less<br>than minimum<br>established design<br>limits.                           | AND  C.2 Verify no evidence of leakage.                                                                   | 12 hours        |
|                                                                                                   | AND                                                                                                       |                 |
|                                                                                                   | C.3 Restore electrolyte level to greater than or equal to minimum established design limits.              | <u>31 days</u>  |
| D. One [or two] batter[y][ies on one subsystem] with pilot cell electrolyte temperature less than | D.1 Restore battery pilot cell temperature to greater than or equal to minimum established design limits. | 12 hours        |

| minimum established design limits.                                                                                                                                                                                                    |              |                                                                             |             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------|-------------|
| E. One or more batteries in redundant subsystems with battery parameters not within limits.                                                                                                                                           | <u>E.1</u>   | Restore battery parameters for batteries in one subsystem to within limits. | 2 hours     |
| FB. Required Action and associated Completion Time of Condition A, B, C, D, or E not met.                                                                                                                                             | <u>F</u> B.1 | Declare associated battery inoperable.                                      | Immediately |
| <u>OR</u>                                                                                                                                                                                                                             |              |                                                                             |             |
| One [or two] batter[y][ies on one subsystems] with one or more battery cells float voltage < [2.07] V and float current > [2] amps.  One or more batteries with average electrolyte temperature of the representative cells < [60]°F. |              |                                                                             |             |
| — <u>OR</u>                                                                                                                                                                                                                           |              |                                                                             |             |
| One or more batteries with one or more battery cell parameters not within Category C values.                                                                                                                                          |              |                                                                             |             |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                         | FREQUENCY |
|------------|----------------------------------------------------------------------|-----------|
| SR 3.8.6.1 | Verify battery cell parameters meet Table 3.8.6-1 Category A limits. | 7 days    |

# SURVEILLANCE REQUIREMENTS (continued)

|            | SURVEILLANCE                                                                                                           | FREQUENCY                                                                                                               |
|------------|------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.2 | Verify battery cell parameters meet Table 3.8.6-1 Category B limits.                                                   | 92 days  AND  Once within 24 hours after battery discharge <[110] V  AND  Once within 24 hours after battery overcharge |
| SR 3.8.6.3 | Verify average electrolyte temperature of representative cells is ≥ [60]°F.                                            | > [150] V<br>92 days                                                                                                    |
| SR 3.8.6.1 | Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. |                                                                                                                         |
|            | Verify each battery float current is ≤ [2] amps.                                                                       | 7 days                                                                                                                  |
| SR 3.8.6.2 | Verify each battery pilot cell float voltage is ≥ [2.07] V.                                                            | <u>31 days</u>                                                                                                          |
| SR 3.8.6.3 | Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.    | <u>31 days</u>                                                                                                          |
| SR 3.8.6.4 | Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.              | 31 days                                                                                                                 |
| SR 3.8.6.5 | Verify each battery connected cell float voltage is ≥ [2.07] V.                                                        | 92 days                                                                                                                 |
|            |                                                                                                                        |                                                                                                                         |

| SR 3.8.6.6 | This Surveillance shall not be performed in MODE 1, 2, 3, or 4. However, credit may be taken for unplanned events that satisfy this SR.                  |                                                                                                                                   |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
|            | Verify battery capacity is ≥ [80%] of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | 60 months  AND                                                                                                                    |
|            |                                                                                                                                                          | 12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating |
|            |                                                                                                                                                          | AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating                  |

# Table 3.8.6-1 (page 1 of 1) Battery Surveillance Requirements

| PARAMETER              | CATEGORY A:<br>LIMITS FOR EACH<br>DESIGNATED<br>PILOT CELL                         | CATEGORY B:<br>LIMITS FOR EACH<br>CONNECTED CELL                                   | CATEGORY C: ALLOWABLE LIMITS FOR EACH CONNECTED CELL                                                    |
|------------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Electrolyte Level      | > Minimum level indication mark, and ½ inch above maximum level indication mark(a) | > Minimum level indication mark, and ½ inch above maximum level indication mark(a) | Above top of plates,<br>and not<br>overflowingng                                                        |
| Float Voltage          | ≥ 2.13 V                                                                           | ≥ 2.13 V                                                                           | > 2.07 V                                                                                                |
| Specific Gravity(b)(c) | ≥ [1.200]                                                                          | <u>≥ [1.195]</u>                                                                   | Not more than 0.020 below average of all connected cells  AND  Average of all connected cells ≥ [1.195] |

- (a) It is acceptable for the electrolyte level to temporarily increase above the specified maximum during equalizing charges provided it is not overflowing.
- (b) Corrected for electrolyte temperature and level. Level correction is not required, however, when battery charging is < [2] amps when on float charge.
- (c) A battery charging current of < [2] amps when on float charge is acceptable for meeting specific gravity limits following a battery recharge, for a maximum of [7] days. When charging current is used to satisfy specific gravity requirements, specific gravity of each connected cell shall be measured prior to expiration of the [7] day allowance.

# 5.5 Programs and Manuals

| 5.5.17 | Battery Monitoring and Maintenance Program                                                                                     |  |
|--------|--------------------------------------------------------------------------------------------------------------------------------|--|
|        | This Program provides for battery restoration and maintenance, which includes the following:                                   |  |
|        | a. Actions to restore battery cells with float voltage < [2.13] V;                                                             |  |
|        | b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plates; and |  |
|        | c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.      |  |

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### BACKGROUND

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment and preferred AC vital bus power (via inverters). As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the recommendations of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The [125/250] VDC electrical power system consists of two independent and redundant safety related Class 1E DC electrical power subsystems ([Train A and Train B]). Each subsystem consists of [two] 125 VDC batteries [(each battery [50]% capacity)], the associated battery charger(s) for each battery, and all the associated control equipment and interconnecting cabling.

[The 250 VDC source is obtained by use of the two 125 VDC batteries connected in series. Additionally there is [one] spare battery charger per subsystem, which provides backup service in the event that the preferred battery charger is out of service. If the spare battery charger is substituted for one of the preferred battery chargers, then the requirements of independence and redundancy between subsystems are maintained.]

During normal operation, the [125/250] VDC load is powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC load is automatically powered from the station batteries.

The [Train A and Train B] DC electrical power subsystems provide the control power for its associated Class 1E AC power load group, [4.16] kV switchgear, and [480] V load centers. The DC electrical power subsystems also provide DC electrical power to the inverters, which in turn power the AC vital buses.

The DC power distribution system is described in more detail in the Bases for LCO 3.8.9, "Distributions System Operating," and for LCO 3.8.10, "Distribution Systems - Shutdown."

# BACKGROUND (continued)

Each battery has adequate storage capacity to carry the required load continuously for at least 2 hours and to perform three complete cycles of intermittent loads discussed in the FSAR, Chapter [8] (Ref. 4).

Each 125/250 VDC battery is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystem to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [ There is no sharing between redundant Class 1E subsystems, such as batteries, battery chargers, or distribution panels.]

Each battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for Train A and Train B DC electrical power subsystems are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The minimum design voltage limit is [105/210] V. Battery size is based on 125% of required capacity and, after selection of an available commercial battery, results in a battery capacity in excess of 150% of required capacity. The voltage limit is 2.13 V per cell, which corresponds to a total minimum voltage output of 128 V per battery discussed in the FSAR, Chapter [8] (Ref. 4). The criteria for sizing large lead storage batteries are defined in IEEE-485 (Ref. 5).

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each Train A and Train B DC electrical power subsystem <u>battery charger</u> has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger also has

DC Sources - Operating B 3.8.4

sufficient <u>excess</u> capacity to restore the battery from the design minimum charge to its fully charged state within [24] hours while supplying normal steady state loads discussed in the FSAR, Chapter [8] (Ref. 4).

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

APPLICABLE SAFETY ANALYSES The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 56) and Chapter [15] (Ref. 67), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC sources is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining the DC sources OPERABLE during accident conditions in the event of:

# APPLICABLE SAFETY ANALYSIS (continued)

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst-case single failure.

The DC sources satisfy Criterion 3 of the NRC Policy Statement.

#### LCO

The DC electrical power subsystems, each subsystem consisting of [two] batteries, battery charger [for each battery] and the corresponding control equipment and interconnecting cabling supplying power to the associated bus within the <u>subsystem train</u> are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any <u>train</u>-DC electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4).

An OPERABLE DC electrical power subsystem requires all required batteries and respective chargers to be operating and connected to the associated DC bus(es).

#### **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure safe unit operation and to ensure that:

- Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 5 and 6 are addressed in the Bases for LCO 3.8.5, "DC Sources - Shutdown."

#### **ACTIONS**

# A.1, A.2, and A.3

Condition A represents one subsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum

established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

------REVIEWER'S NOTE------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

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A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it is now fully capable of supplying the maximum expected load requirement. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

# ----REVIEWER'S NOTE----

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, the 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

# <u>B.1</u>

#### -----REVIEWER'S NOTES-----

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177 and RG 1.174.
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one division] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one subsystem with one [or two] batter[y][ies] inoperable. With one [or two] batter[y][ies] inoperable, the DC bus is being supplied by the OPERABLE battery charger[s]. Any event that results in a loss of the AC bus supporting the battery charger[s] will also

result in loss of DC to that subsystem. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[y][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[y][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific Completion Times.

#### CA.1

Condition <u>CA</u> represents one <u>subsystem\_train</u>-with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected-<u>train\_subsystem</u>. The 2 hour limit is consistent with the allowed time for an inoperable DC distribution <u>sub</u>system-<u>train</u>.

If one of the required DC electrical power subsystems is inoperable inoperable for reasons other than Condition A or B (e.g., inoperable battery, inoperable battery charger(s), or inoperable battery charger and associated inoperable battery), the remaining DC electrical

#### ACTIONS (continued)

power subsystem has the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure wcould, however, result in the complete loss of the minimum necessary DC electrical subsystems to mitigate a worst case accident the remaining 250/125 VDC electrical power subsystems with attendant loss of ESF functions, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 78) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

#### DB.1 and DB.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. The Completion Time to bring the unit to MODE 5 is consistent with the time required in Regulatory Guide 1.93 (Ref. 78).

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.4.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the battery chargers, which support the ability of the batteries to perform their intended function charging system and the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery (or battery cell) and maintain the battery (or a battery cell) in a fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life.. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The 7 day Frequency is consistent with manufacturer recommendations and IEEE-450 (Ref. 9).

# SURVEILLANCE REQUIREMENTS (continued)

### SR 3.8.4.2

Visual inspection to detect corrosion of the battery cells and connections, or measurement of the resistance of each intercell, interrack, intertier, and terminal connection, provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

The limits established for this SR must be no more than 20% above the resistance as measured during installation or not above the ceiling value established by the manufacturer.

The Surveillance Frequency for these inspections, which can detect conditions that can cause power losses due to resistance heating, is 92 days. This Frequency is considered acceptable based on operating experience related to detecting corrosion trends.

## SR 3.8.4.3

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

[The 12 month Frequency for this SR is consistent with IEEE-450 (Ref. 9), which recommends detailed visual inspection of cell condition and rack integrity on a yearly basis.]

#### SR 3.8.4.4 and SR 3.8.4.5

Visual inspection and resistance measurements of intercell, interrack, intertier, and terminal connections provide an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The anticorrosion material is used to help ensure good electrical connections and to reduce terminal deterioration. The visual inspection for corrosion is not intended to require removal of and inspection under each terminal connection. The removal of visible corrosion is a preventive maintenance SR. The presence of visible corrosion does not necessarily represent a failure of this SR provided visible corrosion is removed during performance of SR 3.8.4.4.

### SURVEILLANCE REQUIREMENTS (continued)

Reviewer's Note: The requirement to verify that terminal connections are clean and tight applies only to nickel cadmium batteries as per IEEE Standard P1106, "IEEE Recommended Practice for Installation, Maintenance, Testing and Replacement of Vented Nickel—Cadmium Batteries for Stationary Applications." This requirement may be removed for lead acid batteries.

The connection resistance limits for SR 3.8.4.5 shall be no more than 20% above the resistance as measured during installation, or not above the ceiling value established by the manufacturer.

[The Surveillance Frequencies of 12 months is consistent with IEEE-450 (Ref. 9), which recommends cell to cell and terminal connection resistance measurement on a yearly basis.]

#### SR 3.8.4.26

This SR <u>verifies</u> requires that each battery charger be capable of supplying [400] amps and [250/125] V for ≥ [8] hours. These requirements are based on the design capacity of the <u>battery</u> chargers (Ref. 4). According to Regulatory Guide 1.32 (Ref. 810), the battery charger supply is required-recommended to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period is sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the battery service test and will need to be supplemented with additional loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage,

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temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is  $\leq$  [2] amps.

The Surveillance Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these [18 month] intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

#### SURVEILLANCE REQUIREMENTS (continued)

### SR 3.8.4.37

A battery service test is a special test of battery capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length should correspond to the design duty cycle requirements as specified in Reference 4.

The Surveillance Frequency of [18 months] is consistent with the recommendations of Regulatory Guide 1.32 (Ref. <u>8</u>10) and Regulatory Guide 1.129 (Ref. <u>9</u>11), which state that the battery service test should be performed during refueling operations, or at some other outage, with intervals between tests not to exceed [18 months].

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test-once per 60 months.

The modified performance discharge test is a simulated duty cycle consisting of just two rates; the one minute rate published for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a rated one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test should remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

The reason for Note 2 is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

# SURVEILLANCE REQUIREMENTS (continued)

#### SR 3.8.4.8

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the "as found" condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

A battery modified performance discharge test is described in the Bases for SR 3.8.4.7. Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.4.8; however, only the modified performance discharge test may be used to satisfy SR 3.8.4.8 while satisfying the requirements of SR 3.8.4.7 at the same time.

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 9) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 9), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is  $\geq$  [10%] below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 9).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

| REFERENCES | 1.            | 10 CFR.50, Appendix A, GDC 17          |
|------------|---------------|----------------------------------------|
|            | 2.            | Regulatory Guide 1.6, March 10, 1971.  |
|            | 3.            | IEEE-308-[1978].                       |
|            | 4.            | FSAR, Chapter [8].                     |
|            | <del>5.</del> | IEEE-485-[1983], June 1983.            |
|            | <u>5</u> 6.   | FSAR, Chapter [6].                     |
|            | <u>6</u> 7.   | FSAR, Chapter [15].                    |
|            | <u>7</u> 8.   | Regulatory Guide 1.93, December 1974.  |
|            | 9.            | IEEE-450-[1987].                       |
|            | <u>8</u> 10.  | Regulatory Guide 1.32, February 1977.  |
|            | <u>9</u> 11.  | Regulatory Guide 1.129, December 1974. |

# B 3.8 ELECTRICAL POWER SYSTEMS

# B 3.8.5 DC Sources - Shutdown

# **BASES**

| BACKGROUND                       | A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| APPLICABLE<br>SAFETY<br>ANALYSES | The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [15] (Ref. 2), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.                                                                                                                                                                                                                                                                                       |  |
|                                  | The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |
|                                  | The OPERABILITY of the minimum DC electrical power sources during MODES 5 and 6 and during movement of irradiated fuel assemblies ensures that:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
|                                  | <ul> <li>The unit can be maintained in the shutdown or refueling condition<br/>for extended periods;</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
|                                  | <ul> <li>Sufficient instrumentation and control capability is available for<br/>monitoring and maintaining the unit status; and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |
|                                  | c. Adequate DC electrical power is provided to mitigate events postulated during shutdown, such as a fuel handling accident.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |
|                                  | The DC sources satisfy Criterion 3 of the NRC Policy Statement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  |
| LCO                              | The DC electrical power subsystems, each subsystem consisting of two batteries, one battery charger per battery, and the corresponding control equipment and interconnecting cabling within the <a href="mailto:trains_ubsystem">trains_ubsystem</a> , are required to be OPERABLE to support required <a href="mailto:trains_subsystems">trains_subsystems</a> of distribution systems required OPERABLE by LCO 3.8.10, "Distribution Systems - Shutdown." This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents). |  |

#### **APPLICABILITY**

The DC electrical power sources required to be OPERABLE in MODES 5 and 6, and during movement of irradiated fuel assemblies provide assurance that:

- a. Required features needed to mitigate a fuel handling accident are available:
- b. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- c. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.4.

#### **ACTIONS**

#### A.1, A.2, and A.3

-----REVIEWER'S NOTE------

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both subsystems of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one subsystem of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as ACTION A.

Condition A represents one subsystem with one [or two] battery charger[s] inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

#### ------REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging

<u>current portion of the battery charge profile following the service test</u> (SR 3.8.4.3).

\_\_\_\_\_

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

# -----REVIEWER'S NOTE-----

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of

restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

### BA.1, BA.2.1, BA.2.2, BA.2.3, and BA.2.4

If two trains subsystems are required per LCO 3.8.10, the remaining subsystem train with DC power available may be capable of supporting sufficient systems to allow continuation of CORE ALTERATIONS and fuel movement. By allowing the option to declare required features inoperable with the associated DC power source(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO ACTIONS. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions). The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystems and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.5.1

SR 3.8.5.1 states that Surveillances required by SR 3.8.4.1 through SR 3.8.4.38 are applicable in these MODES. See the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

#### REFERENCES

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [15].

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

### B 3.8.6 Battery Cell-Parameters

#### **BASES**

#### **BACKGROUND**

This LCO delineates the limits on battery float current as well as electrolyte temperature, level, and float voltage, and specific gravity for the DC power subsystem source-batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown." In addition to the limitations of this Specification, the [licensee controlled program] also implements a program specified in Specification 5.5.17 for monitoring various battery parameters.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 34) and Chapter [15] (Ref. 42), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one <a href="trainsubsystem">trainsubsystem</a> of DC sources OPERABLE during accident conditions, in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst case single failure.

Battery cell-parameters satisfy Criterion 3 of the NRC Policy Statement.

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#### LCO

Battery cell-parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Battery parameter Electrolyte limits are conservatively established, allowing continued DC electrical system function even with Category A and B-limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.17.

#### **APPLICABILITY**

The battery cell-parameters are required solely for the support of the associated DC electrical power subsystems. Therefore, battery electrolyte-parameter limits are is only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in the Bases for LCO 3.8.4 and LCO 3.8.5.

#### **ACTIONS**

#### A.1. A.2. and A.3

With one or more cells in one or more batteries not within limits (i.e., Category A limits not met or Category B limits not met or Category A and B limits not met) but within the Category C limits specified in Table 3.8.6-1, the battery is degraded but there is still sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of Category A or B limits not met, and continued operation is permitted for a limited period.

The pilot cell electrolyte level and float voltage are required to be verified to meet the Category C limits within 1 hour (Required Action A.1). This check will provide a quick indication of the status of the remainder of the battery cells. One hour provides time to inspect the electrolyte level and to confirm the float voltage of the pilot cells. One hour is considered a reasonable amount of time to perform the required verification.

Verification that the Category C limits are met (Required Action A.2) provides assurance that during the time needed to restore the parameters to the Category A and B limits, the battery will still be capable of performing its intended function. A period of 24 hours is allowed to complete the initial verification because specific gravity measurements must be obtained for each connected cell. Taking into consideration both the time required to perform the required verification and the assurance that the battery cell parameters are not severely degraded, this time is considered reasonable. The verification is repeated at 7 day intervals until the parameters are restored to Category A and B limits. This periodic verification is consistent with the normal Frequency of pilot cell Surveillances.

Continued operation is only permitted for 31 days before battery cell parameters must be restored to within Category A and B limits. With the consideration that, while battery capacity is degraded, sufficient capacity exists to perform the intended function and to allow time to fully restore the battery cell parameters to normal limits, this time is acceptable prior to declaring the battery inoperable.

# A.1, A.2, and A.3

With one or more cells in one or more batteries in one subsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable

solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

#### B.1 and B.2

One or more batteries in one subsystem with float current > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "OR" statement in Condition F is applicable and the battery must be declared inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action B.2) from any discharge that might have occurred due to a temporary loss of the battery charger.

------REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging

<u>current portion of the battery charge profile following the service test</u> (SR 3.8.4.3).

\_\_\_\_\_

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

# C.1, C.2, and C.3

With one or more batteries in one subsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.17, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.17.b item to initiate action to equalize and test in accordance with manufacturer's recommendation. They are performed following the restoration of the electrolyte level to above the top of the plates. Based on the results of

the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

# <u>D.1</u>

With one or more batteries in one subsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

# <u>E.1</u>

With one or more batteries in redundant subsystem's with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one subsystem within 2 hours.

#### F**B**.1

With one or more batteries with <u>any one or more</u> battery <u>cell-parameters</u> outside the <u>allowances of the Required Actions for Condition A, B, C, D, or E, Category C limit for any connected cell, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding <u>battery DC electrical power subsystem</u> must be declared</u>

#### ACTIONS (continued)

inoperable. Additionally, discovering one or more batteries in one subsystem with one or more battery cells float voltage less than [2.07] V and float current greater than [2] amps indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately other potentially extreme conditions, such as not completing the Required Actions of Condition A within the required Completion Time or average electrolyte temperature of representative cells falling below 60°F, are also cause for immediately declaring the associated DC electrical power subsystem inoperable.

# SURVEILLANCE REQUIREMENTS

## SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The equipment used to monitor float current must have the necessary accuracy and capability to measure electrical currents in the expected range. The float current requirements are based on the float current indicative of a charged battery. The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

# SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge, which could eventually render the battery inoperable. Float voltages in this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.17. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

### SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The minimum design electrolyte level is the minimum level indication mark on the battery cell jar. The Frequency is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provide the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

## SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain

above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's ratings. Degradation is indicated, according to IEEE-450 (Ref. 1), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is  $\geq$  [10%] below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems. Credit may be taken for unplanned events that satisfy this SR.

This SR verifies that Category A battery cell parameters are consistent with IEEE-450 (Ref. 3), which recommends regular battery inspections (at least one per month) including voltage, specific gravity, and electrolyte temperature of pilot cells.

#### SR 3.8.6.2

The quarterly inspection of specific gravity and voltage is consistent with IEEE 450 (Ref. 3). In addition, within 24 hours of a battery discharge < [110] V or a battery overcharge > [150] V, the battery must be demonstrated to meet Category B limits. Transients, such as motor starting transients, which may momentarily cause battery voltage to drop to ≤ [110] V, do not constitute a battery discharge provided the battery terminal voltage and float current return to pre-transient values. This inspection is also consistent with IEEE 450 (Ref. 3), which recommends special inspections following a severe discharge or overcharge, to ensure that no significant degradation of the battery occurs as a consequence of such discharge or overcharge.

Battery Cell-Parameters | B 3.8.6

# SR 3.8.6.3

This Surveillance verification that the average temperature of representative cells is > [60]°F is consistent with a recommendation of IEEE-450 (Ref. 3), which states that the temperature of electrolytes in representative cells should be determined on a quarterly basis.

Lower than normal temperatures act to inhibit or reduce battery capacity. This SR ensures that the operating temperatures remain within an acceptable operating range. This limit is based on manufacturer recommendations.

# SURVEILLANCE REQUIREMENTS (continued)

## Table 3.8.6-1

This table delineates the limits on electrolyte level, float voltage, and specific gravity for three different categories. The meaning of each category is discussed below.

Category A defines the normal parameter limit for each designated pilot cell in each battery. The cells selected as pilot cells are those whose temperature, voltage and electrolyte specific gravity approximate the state of charge of the entire battery.

The Category A limits specified for electrolyte level are based on manufacturer recommendations and are consistent with the guidance in IEEE-450 (Ref. 3), with the extra ¼ inch allowance above the high water level indication for operating margin to account for temperatures and charge effects. In addition to this allowance, footnote a to Table 3.8.6-1 permits the electrolyte level to be above the specified maximum level during equalizing charge, provided it is not overflowing. These limits ensure that the plates suffer no physical damage, and that adequate electron transfer capability is maintained in the event of transient conditions. IEEE-450 (Ref. 3) recommends that electrolyte level readings should be made only after the battery has been at float charge for at least 72 hours.

The Category A limit specified for float voltage is ≥ 2.13 V per cell. This value is based on a recommendation of IEEE-450 (Ref. 3), which states that prolonged operation of cells < 2.13 V can reduce the life expectancy of cells.

The Category A limit specified for specific gravity for each pilot cell is ≥ [1.200] (0.015 below the manufacturer fully charged nominal specific gravity or a battery charging current that had stabilized at a low value). This value is characteristic of a charged cell with adequate capacity. According to IEEE-450 (Ref. 3), the specific gravity readings are based on a temperature of 77°F (25°C).

The specific gravity readings are corrected for actual electrolyte temperature and level. For each 3°F (1.67°C) above 77°F (25°C), 1 point (0.001) is added to the reading; 1 point is subtracted for each 3°F below 77°F. The specific gravity of the electrolyte in a cell increases with a loss of water due to electrolysis or evaporation.

## SURVEILLANCE REQUIREMENTS (continued)

Category B defines the normal parameter limits for each connected cell.

The term "connected cell" excludes any battery cell that may be jumpered out.

The Category B limits specified for electrolyte level and float voltage are the same as those specified for Category A and have been discussed above. The Category B limit specified for specific gravity for each connected cell is  $\geq$  [1.195] (0.020 below the manufacturer fully charged, nominal specific gravity) with the average of all connected cells  $\geq$  [1.205] (0.010 below the manufacturer fully charged, nominal specific gravity). These values are based on manufacturer's recommendations. The minimum specific gravity value required for each cell ensures that the effects of a highly charged or newly installed cell will not mask overall degradation of the battery.

Category C defines the limit for each connected cell. These values, although reduced, provide assurance that sufficient capacity exists to perform the intended function and maintain a margin of safety. When any battery parameter is outside the Category C limit, the assurance of sufficient capacity described above no longer exists and the battery must be declared inoperable.

The Category C limit specified for electrolyte level (above the top of the plates and not overflowing) ensures that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C Allowable Value for float voltage is based on IEEE-450 (Ref. 3), which states that a cell voltage of 2.07 V or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limit of average specific gravity ≥ [1.195] is based on manufacturer recommendations (0.020 below the manufacturer recommended fully charged, nominal specific gravity). In addition to that limit, it is required that the specific gravity for each connected cell must be no less than 0.020 below the average of all connected cells. This limit ensures that the effect of a highly charged or new cell does not mask overall degradation of the battery.

The footnotes to Table 3.8.6-1 are applicable to Category A, B, and C specific gravity. Footnote (b) to Table 3.8.6-1 requires the above mentioned correction for electrolyte level and temperature, with the exception that level correction is not required when battery charging current is < [2] amps on float charge. This current provides, in general, an indication of overall battery condition.

## SURVEILLANCE REQUIREMENTS (continued)

Because of specific gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger current is an acceptable alternative to specific gravity measurement for determining the state of charge. This phenomenon is discussed in IEEE-450 (Ref. 3). Footnote (c) to Table 3.8.6-1 allows the float charge current to be used as an alternate to specific gravity for up to [7] days following a battery equalizing recharge. Within [7] days, each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less than [7] days.

[Reviewer's Note: The value of [2] amps used in footnote (b) and (c) is the nominal value for float current established by the battery vendor as representing a fully charged battery with an allowance for overall battery condition.]

| REFERENCES | 1. IEEE-450.                   |
|------------|--------------------------------|
|            | 2. FSAR, Chapter 8.            |
|            | 34. FSAR, Chapter [6].         |
|            | 42. FSAR, Chapter [15].        |
|            | 3. IEEE-450-[1980].            |
|            | 5. IEEE-485-[1983], June 1983. |

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.4 DC Sources - Operating

LCO 3.8.4 The [Division 1 and Division 2 station service, and DG 1B, 2A, and 2C]

DC electrical power subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

# **ACTIONS**

| CONDITION                                                                                  |              | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|--------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------|---------------------|
| A. One [or two] battery charger[s] on one subsystem inoperable.                            | <u>A.1</u>   | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
|                                                                                            | AND          |                                                                                                     |                     |
|                                                                                            | <u>A.2</u>   | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
|                                                                                            | AND          |                                                                                                     |                     |
|                                                                                            | <u>A.3</u>   | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours          |
| [B. One [or two] batter[y][ies on one subsystem] inoperable.                               | B.1          | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours ]         |
| CA.One DC electrical power subsystem inoperable for reasons other than Condition A [or B]. | <u>C</u> A.1 | Restore DC electrical power subsystem to OPERABLE status.                                           | [2] hours           |
| DB.Required Action and Associated Completion Time of Condition A not                       | DB.1         | Be in MODE 3.                                                                                       | 12 hours            |
| met for station service DC subsystem.                                                      | <u>D</u> B.2 | Be in MODE 4.                                                                                       | 36 hours            |

| CONDITION                                                                                        | REQUIRED ACTION                        | COMPLETION TIME |
|--------------------------------------------------------------------------------------------------|----------------------------------------|-----------------|
| [ EC. Required Action and associated Completion Time of Condition A not met for DG DC subsystem. | EC.1 Declare associated DG inoperable. | Immediately ]   |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                                 | FREQUENCY |
|------------|------------------------------------------------------------------------------------------------------------------------------|-----------|
| SR 3.8.4.1 | Verify battery terminal voltage is ≥ [120] V on float charge greater than or equal to the minimum established float voltage. | 7 days    |

# SURVEILLANCE REQUIREMENTS (continued)

|                      | SURVEILLANCE                                                                                                                                                                                                               | FREQUENCY          |
|----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| SR 3.8.4.2           | Verify no visible corrosion at battery terminals and connectors.                                                                                                                                                           | <del>92 days</del> |
|                      | <u>OR</u>                                                                                                                                                                                                                  |                    |
|                      | Verify battery connection resistance [is ≤ [1.5E-4 ohm] for inter-cell connections, ≤ [1.5E-4 ohm] for inter-rack connections, ≤ [1.5E-4 ohm] for inter-tier connections, and ≤ [1.5E-4 ohm] for terminal connections].    |                    |
| SR 3.8.4.3           | Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration.                                                                                                       | [12] months        |
| SR 3.8.4.4           | Remove visible corrosion and verify battery cell to cell and terminal connections are [clean and tight, and] coated with anti-corrosion material.                                                                          | [12] months        |
| SR 3.8.4.5           | Verify battery connection resistance [is ≤ [1.5E-4 ohm] for inter-cell connections, ≤ [1.5E-4 ohm] for inter-rack connections, ≤ [1.5E-4 ohm] for inter-tier connections, and ≤ [1.5E-4 ohm] for terminal connections].    | [12] months        |
| SR 3.8.4. <u>2</u> 6 | NOTES  This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.                                                                                |                    |
|                      | Verify each required battery charger supplies  ≥ [400 amps for station service subsystems, and  ≥ 100 amps for DG subsystems] at ≥ [129] V greater than or equal to the minimum established float voltage for ≥ [4] hours. | [18 months]        |
|                      | OR  Verify each battery charger can recharge the battery to the fully charged state within [24] hours while                                                                                                                |                    |

DC Sources - Operating 3.8.4

| supplying the largest combined demands of the  |  |
|------------------------------------------------|--|
| various continuous steady state loads, after a |  |
| battery discharge to the bounding design basis |  |
| event discharge state.                         |  |

# SURVEILLANCE REQUIREMENTS (continued)

|                      | SURVEILLANCE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | FREQUENCY   |  |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|--|
| SR 3.8.4. <u>3</u> 7 | <ol> <li>The modified performance discharge test in SR 3.8.6.64.8 may be performed in lieu of the service test in SR 3.8.4.37 once per 60 months.</li> <li>This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.</li> <li>Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.</li> </ol> | [18 months] |  |

# SURVEILLANCE REQUIREMENTS (continued)

|            | SURVEILLANCE                                                                                                                                             | FREQUENCY                                                                                                                                                                                                                                           |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.4.8 | This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.                     |                                                                                                                                                                                                                                                     |
|            | Verify battery capacity is ≥ [80]% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | AND  12 months when battery shows degradation or has reached [85]% of expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating |

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.5 DC Sources - Shutdown

LCO 3.8.5 DC electrical power subsystems shall be OPERABLE to support the DC

electrical power distribution subsystem(s) required by LCO 3.8.10,

"Distribution Systems - Shutdown."

APPLICABILITY: MODES 5 and 6,

During movement of irradiated fuel assemblies in the [secondary]

containment.

# **ACTIONS**

| CONDITION                                                                                   | REQUIRED ACTION                                                                                              | COMPLETION TIME     |
|---------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|---------------------|
| [A. One [or two] battery charger[s on one subsystem] inoperable.  AND                       | A.1 Restore battery terminal voltage to greater than or equal to the minimum established float voltage.  AND | 2 hours             |
| The redundant subsystem battery and charger[s] OPERABLE.                                    | A.2 Verify battery float current ≤ [2] amps.                                                                 | Once per [12] hours |
|                                                                                             | AND  A.3 Restore battery charger[s] to OPERABLE status.                                                      | [72] hours          |
| BA. One or more required DC electrical power subsystems inoperable. [for reasons other than | BA.1 Declare affected required feature(s) inoperable.  OR                                                    | Immediately         |
| Condition A.  OR                                                                            | BA.2.1 Suspend CORE<br>ALTERATIONS.                                                                          | Immediately         |
| Required Actions and associated Completion Time of Condition A not met]                     | AND  BA.2.2 Suspend movement of irradiated fuel assemblies in the [secondary] containment.                   | Immediately         |

| CONDITION | REQUIRED ACTION                                                                                          | COMPLETION TIME |
|-----------|----------------------------------------------------------------------------------------------------------|-----------------|
|           | AND  BA.2.3 Initiate action to suspend operations with a potential for draining the reactor vessel.  AND | Immediately     |

# ACTIONS (continued)

| CONDITION | REQUIRED ACTION                                                                               | COMPLETION TIME |  |
|-----------|-----------------------------------------------------------------------------------------------|-----------------|--|
|           | BA.2.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status. | Immediately     |  |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                                                                                                                                                                                                                           | FREQUENCY                               |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| SR 3.8.5.1 | The following SRs are not required to be performed: SR 3.8.4.2 6, and SR 3.8.4.37, and SR 3.8.4.8.  For DC sources required to be OPERABLE the following SRs are applicable:  SR 3.8.4.1 SR 3.8.4.4 SR 3.8.4.7 SR 3.8.4.2 SR 3.8.4.5 SR 3.8.4.8. SR 3.8.4.3 SR 3.8.4.6 | In accordance<br>with applicable<br>SRs |

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.6 Battery Cell Parameters

LCO 3.8.6 Battery cell-parameters for the [station service and DG] electrical power

subsystem batteries shall be within the limits of Table 3.8.6-1.

APPLICABILITY: When associated DC electrical power subsystems are required to be

OPERABLE.

| Λ | C7      | EL. | $\sim$ | N  |   |
|---|---------|-----|--------|----|---|
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-----NOTE------

Separate Condition entry is allowed for each battery.

| CONDITION                                                                                            | REQUIRED ACTION                                                                                    | COMPLETION TIME                           |
|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-------------------------------------------|
| A. One or more batteries with one or more battery cell parameters not within Category A or B limits. | A.1 Verify pilot cell[s] electrolyte level and float voltage meet Table 3.8.6-1 Category C limits. | <del>1 hour</del>                         |
|                                                                                                      | A.2 Verify battery cell parameters meet Table 3.8.6-1 Category C limits.                           | 24 hours  AND  Once per 7 days thereafter |
|                                                                                                      | AND                                                                                                |                                           |
|                                                                                                      | A.3 Restore battery cell parameters to Category A and B limits of Table 3.8.6-1.                   | <del>31 days</del>                        |

# ACTIONS (continued)

| CONDITION                                                                                                | REQUIRED ACTION                                                                                           | COMPLETION TIME |
|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|-----------------|
| A. One [or two] batter[y][ies on one subsystem] with one or more battery cells float voltage < [2.07] V. | A.1 Perform SR 3.8.4.1.                                                                                   | 2 hours         |
|                                                                                                          | AND AND AND                                                                                               | 2 hours         |
|                                                                                                          | AND  A.3 Restore affected cell  voltage ≥ [2.07] V.                                                       | 24 hours        |
| B. One [or two] batter[y][ies on one subsystem] with float current > [2] amps.                           | B.1 Perform SR 3.8.4.1.  AND                                                                              | 2 hours         |
|                                                                                                          | B.2 Restore battery float current to ≤ [2] amps.                                                          | [12] hours      |
| Required Action C.2 shall be completed if electrolyte level was below the top of plates.                 | Required Actions C.1 and C.2 are only applicable if electrolyte level was below the top of plates.        |                 |
| C. One [or two] batter[y][ies on one subsystem] with one or more cells                                   | C.1 Restore electrolyte level to above top of plates.                                                     | 8 hours         |
| electrolyte level less than minimum established design limits.                                           | C.2 Verify no evidence of leakage.                                                                        | 12 hours        |
|                                                                                                          | AND                                                                                                       |                 |
|                                                                                                          | C.3 Restore electrolyte level to greater than or equal to minimum established design limits.              | <u>31 days</u>  |
| D. One [or two] batter[y][ies on one subsystem] with pilot cell electrolyte temperature less than        | D.1 Restore battery pilot cell temperature to greater than or equal to minimum established design limits. | 12 hours        |

| minimum established design limits.                                                                                                                                                                                                                                                                                                             |              |                                                                             |             |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------|-------------|
| E. One or more batteries in redundant subsystems with battery parameters not within limits.                                                                                                                                                                                                                                                    | <u>E.1</u>   | Restore battery parameters for batteries in one subsystem to within limits. | 2 hours     |
| EB. Required Action and associated Completion Time of Condition A.B.C.D. or E not met.                                                                                                                                                                                                                                                         | <u>F</u> B.1 | Declare associated battery inoperable.                                      | Immediately |
| One [or two] batter[y][ies on one subsystem] with one or more battery cells float voltage < [2.07] V and float current > [2] amps. One or more batteries with average electrolyte temperature of the representative cells not within limits.  OR  One or more batteries with one or more battery cell parameters not within Category C values. |              |                                                                             |             |

# SURVEILLANCE REQUIREMENTS

|            | SURVEILLANCE                                                         | FREQUENCY         |
|------------|----------------------------------------------------------------------|-------------------|
| SR 3.8.6.1 | Verify battery cell parameters meet Table 3.8.6-1 Category A limits. | <del>7 days</del> |

# SURVEILLANCE REQUIREMENTS (continued)

|            | SURVEILLANCE                                                                                                                                 | FREQUENCY                                                                                                                          |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.2 | Verify battery cell parameters meet Table 3.8.6-1 Category B limits.                                                                         | 92 days  AND  Once within 24 hours after battery discharge < [110] V  AND  Once within 24 hours after battery overcharge > [150] V |
| SR 3.8.6.3 | Verify average electrolyte temperature of representative cells is ≥ [65°F for each station service battery, and ≥ 55°F for each DG battery]. | <del>92 days</del>                                                                                                                 |
| SR 3.8.6.1 | Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1.                       |                                                                                                                                    |
|            | Verify each battery float current is ≤ [2] amps.                                                                                             | 7 days                                                                                                                             |
| SR 3.8.6.2 | Verify each battery pilot cell float voltage is $\geq$ [2.07] $\underline{V}$ .                                                              | 31 days                                                                                                                            |
| SR 3.8.6.3 | Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.                          | 31 days                                                                                                                            |
| SR 3.8.6.4 | Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.                                    | 31 days                                                                                                                            |
| SR 3.8.6.5 | Verify each battery connected cell float voltage is                                                                                          | 92 days<br>Rev. 1.0, 04/07/95                                                                                                      |

|            | <u>≥ [2.07] V.</u>                                                                                                                                       |                                                                                                                                                                                                                                                          |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.6 | This Surveillance shall not normally be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.            |                                                                                                                                                                                                                                                          |
|            | Verify battery capacity is ≥ [80%] of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | AND  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating |

# Table 3.8.6-1 (page 1 of 1) Battery Cell Parameter Requirements

| PARAMETER               | CATEGORY A: LIMITS FOR EACH DESIGNATED PILOT CELL                                    | CATEGORY B:<br>LIMITS FOR EACH<br>CONNECTED CELL                                                 | CATEGORY C: ALLOWABLE LIMITS FOR EACH CONNECTED CELL                                                    |
|-------------------------|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Electrolyte Level       | ➤ Minimum level indication mark, and ≤ ¼ inch above maximum level indication mark(a) | ➤ Minimum level indication mark, and ≤ ¼ inch above maximum level indication mark <sup>(a)</sup> | Above top of plates, and not overflowing                                                                |
| Float Voltage           | ≥ 2.13 V                                                                             | ≥ 2.13 V                                                                                         | > 2.07 V                                                                                                |
| Specific Gravity (b)(c) | <u>≥ [1.195]</u>                                                                     | ≥ [1.195]  AND  Average of all connected cells  > [1.205]                                        | Not more than 0.020 below average of all connected cells  AND  Average of all connected cells ≥ [1.195] |

<sup>(</sup>a) It is acceptable for the electrolyte level to temporarily increase above the specified maximum level during equalizing charges provided it is not overflowing.

<sup>(</sup>b) Corrected for electrolyte temperature and level. Level correction is not required, however, when on float charge battery charging current is < [1 amp for station service batteries and < 0.5 amp for DG batteries].

<sup>(</sup>c) A battery charging current of < [1 amp for station service batteries and < 0.5 amp for DG batteries] when on float charge is acceptable for meeting specific gravity limits following a battery recharge, for a maximum of [7] days. When charging current is used to satisfy specific gravity requirements, specific gravity of each connected cell shall be measured prior to expiration of the [7] day allowance.

# 5.5 Programs and Manuals

| 5.5.14 | Battery Monitoring and Maintenance Program                                                                                     |
|--------|--------------------------------------------------------------------------------------------------------------------------------|
|        | This Program provides for battery restoration and maintenance, which includes the following:                                   |
|        | a. Actions to restore battery cells with float voltage < [2.13] V;                                                             |
|        | b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plates; and |
|        | c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.      |

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### **BACKGROUND**

The DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment. Also, these DC subsystems provide DC electrical power to inverters, which in turn power the AC vital buses. As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the recommendations of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The station service DC power sources provide both motive and control power to selected safety related equipment, as well as circuit breaker control power for the nonsafety related 4160 V, and all 600 V and lower, AC distribution systems. Each DC subsystem is energized by one 125/250 V station service battery and three 125 V battery chargers (two normally inservice chargers and one spare charger). Each battery is exclusively associated with a single 125/250 VDC bus. Each set of battery chargers exclusively associated with a 125/250 VDC subsystem cannot be interconnected with any other 125/250 VDC subsystem. The normal and backup chargers are supplied from the same AC load groups for which the associated DC subsystem supplies the control power. The loads between the redundant 125/250 VDC subsystem are not transferable except for the Automatic Depressurization System, the logic circuits and valves of which are normally fed from the Division 1 DC system.

The diesel generator (DG) DC power sources provide control and instrumentation power for their respective DG. In addition, DG 2A and 2C DC power sources provide circuit breaker control power for the loads on the 4160 V 2E, 2F, and 2G emergency buses. Each DG DC subsystem is energized by one 125 V battery and one 125 V battery charger. Provisions exist for connecting a portable alternate battery charger.

During normal operation, the DC loads are powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC loads are automatically powered from the station batteries.

# BACKGROUND (continued)

The DC power distribution system is described in more detail in Bases for LCO 3.8.9, "Distribution System — Operating," and LCO 3.8.10, "Distribution System — Shutdown."

Each battery has adequate storage capacity to carry the required load continuously for approximately 2 hours (Ref. 3).

Each DC battery subsystem is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystems to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [There is no sharing between redundant Class 1E subsystems such as batteries, battery chargers, or distribution panels.]

Each battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for DC electrical power subsystems are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The minimum design voltage limit is [105/210] V.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each battery charger of DC electrical power subsystem <u>battery charger</u> has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each station service battery charger has sufficient <u>excess</u> capacity to restore the battery from the design minimum charge to its fully charged state within [24] hours while supplying normal steady state loads (Ref. <u>43</u>).

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 54) and Chapter [15] (Ref. 65), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation. The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining DC sources OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst case single failure.

The DC sources satisfy Criterion 3 of the NRC Policy Statement.

## LCO

The DC electrical power subsystems — with: 1) each station service DC subsystem consisting of two 125 V batteries in series two battery chargers and the corresponding control equipment and interconnecting cabling supplying power to the associated bus, and 2) each DG DC subsystem consisting of one battery bank, one battery charger, and the corresponding control equipment and interconnecting cabling are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any DC electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 43).

#### **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, and 3 to ensure safe unit operation and to ensure that:

- Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 4 and 5 are addressed in the Bases for LCO 3.8.5, "DC Sources — Shutdown."

## **ACTIONS**

## A.1, A.2, and A.3

Condition A represents one subsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

#### -----REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging

<u>current portion of the battery charge profile following the service test</u> (SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it is now fully capable of supplying the maximum expected load requirement. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

------REVIEWER'S NOTE------

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, the 7 day Completion Time can be justified by an

acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

## B.1

# -----REVIEWER'S NOTES-----

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177 and RG 1.174.
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one subsystem] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one subsystem with one [or two] batter[y][ies] inoperable. With one [or two] batter[y][ies] inoperable, the DC bus is being supplied by the OPERABLE battery charger[s]. Any event that results in a loss of the AC bus supporting the battery charger[s] will also result in loss of DC to that subsystem. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[v][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[y][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific completion times.

# <u>CA.1</u>

Condition <u>CA</u> represents one <u>division\_subsystem</u> with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is therefore imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected <u>division\_subsystem</u>. The 2 hour limit is consistent with the allowed time for an inoperable DC Distribution System <u>division\_subsystem</u>.

If one of the required DC electrical power subsystems is inoperable for reasons other than Condition A or B (e.g., inoperable battery, inoperable battery charger(s), or inoperable battery charger and associated inoperable battery), the remaining DC electrical power subsystems have the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure could, however, result in the loss of minimum necessary DC electrical subsystems to mitigate a worst case accident, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 76) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

#### **BASES**

## ACTIONS (continued)

## DB.1 and DB.2

If the <u>inoperable</u> station service DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 4 is consistent with the time required in Regulatory Guide 1.93 (Ref. <u>76</u>).

#### **EC**.1

If the DG DC electrical power subsystem cannot be restored to OPERABLE status in the associated Completion Time, the associated DG may be incapable of performing its intended function and must be immediately declared inoperable. This declaration also requires entry into

applicable Conditions and Required Actions for an inoperable DG, LCO 3.8.1, "AC Sources — Operating."

# SURVEILLANCE REQUIREMENTS

# SR 3.8.4.1

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the charging system and the ability of the batteries to perform their intended function battery chargers, which support he ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery (or battery cell) and maintain the battery (or a battery cell) in a fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The 7 day Frequency is consistent with manufacturer recommendations and IEEE-450 (Ref. 7).

#### SR 3.8.4.2

Visual inspection to detect corrosion of the battery cells and connections, or measurement of the resistance of each inter-cell, inter-rack, inter-tier, and terminal connection, provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

## SURVEILLANCE REQUIREMENTS (continued)

The connection resistance limits established for this SR must be no more than 20% above the resistance as measured during installation or not above the ceiling value established by the manufacturer.

The Frequency for these inspections, which can detect conditions that can cause power losses due to resistance heating, is 92 days. This Frequency is considered acceptable based on operating experience related to detecting corrosion trends.

## SR 3.8.4.3

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

[The 12 month Frequency for this SR is consistent with IEEE-450 (Ref. 7), which recommends detailed visual inspection of cell condition and rack integrity on a yearly basis.]

#### SR 3.8.4.4 and SR 3.8.4.5

Visual inspection and resistance measurements of inter-cell, inter-rack, inter-tier, and terminal connections provides an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The anti-corrosion material is used to help ensure good electrical connections and to reduce terminal deterioration. The visual inspection for corrosion is not intended to require removal of and inspection under each terminal connection.

The removal of visible corrosion is a preventive maintenance SR. The presence of visible corrosion does not necessarily represent a failure of this SR, provided visible corrosion is removed during performance of this Surveillance.

# SURVEILLANCE REQUIREMENTS (continued)

Reviewer's Note: The requirement to verify that terminal connections are clean and tight applies only to nickel cadmium batteries as per IEEE Standard P1106, "IEEE Recommended Practice for Installation, Maintenance, Testing and Replacement of Vented Nickel - Cadmium Batteries for Stationary Applications." This requirement may be removed for lead acid batteries.

The connection resistance limits for this SR must be no more than 20% above the resistance as measured during installation, or not above the ceiling value established by the manufacturer.

[The 12 month Frequency of these SRs is consistent with IEEE-450 (Ref. 7), which recommends detailed visual inspection of cell condition and inspection of cell to cell and terminal connection resistance on a yearly basis.]

#### SR 3.8.4.26

This SR verifies Battery charger capability requirements are based on the design capacity of the battery chargers (Ref. 3). According to Regulatory Guide 1.32 (Ref. 8), the battery charger supply is required recommended to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period is sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the battery service test and will need to be supplemented with additional loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage, temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is ≤ [2] amps.

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The Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these [18 month] intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

This SR is modified by two Notes. The reason for Note 1 is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. Note 2 is added to this SR to acknowledge that credit may be taken for unplanned events that satisfy the Surveillance.

# SURVEILLANCE REQUIREMENTS (continued)

## SR 3.8.4.37

A battery service test is a special test of the battery's capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length corresponds to the design duty cycle requirements as specified in Reference 4.

The Frequency of [18 months] is consistent with the recommendations of Regulatory Guide 1.32 (Ref. 8) and Regulatory Guide 1.129 (Ref. 9), which state that the battery service test should be performed during refueling operations or at some other outage, with intervals between tests not to exceed [18 months].

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test once per 60 months.

The modified performance discharge test is a simulated duty cycle consisting of just two rates; the one minute rate published for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere hours removed by a rated one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test should remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

The reason for Note 2 is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy the Surveillance.

# SURVEILLANCE REQUIREMENTS (continued)

## SR 3.8.4.8

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

A battery modified performance discharge test is described in the Bases for SR 3.8.4.7. Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.4.8; however, only the modified performance discharge test may be used to satisfy SR 3.8.4.8 while satisfying the requirements of SR 3.8.4.7 at the same time.

The acceptance criteria for this Surveillance is consistent with IEEE-450 (Ref. 7) and IEEE-485 (Ref. 10). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements.

The Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity 100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 7), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is 10% below the manufacturer's rating. All these Frequencies are consistent with the recommendations in IEEE-450 (Ref. 7).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy the Surveillance.

| REFERENCES | 1.            | 10 CFR 50, Appendix A, GDC 17.         |  |
|------------|---------------|----------------------------------------|--|
|            | 2.            | Regulatory Guide 1.6.                  |  |
|            | 3.            | IEEE Standard 308, 1978.               |  |
|            | 4.            | FSAR, Chapter [8].                     |  |
|            | <u>5</u> 4.   | FSAR, Chapter [6].                     |  |
|            | <u>6</u> 5.   | FSAR, Chapter [15].                    |  |
|            | <u>7</u> 6.   | Regulatory Guide 1.93.                 |  |
|            | <del>7.</del> | IEEE Standard 450.                     |  |
|            | 8.            | Regulatory Guide 1.32, February 1977.  |  |
|            | 9.            | Regulatory Guide 1.129, December 1974. |  |
|            | 10.           | IEEE Standard 485, 1983.               |  |

#### B 3.8 ELECTRICAL POWER SYSTEMS

## B 3.8.5 DC Sources - Shutdown

#### **BASES**

# **BACKGROUND** A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating." APPLICABLE The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [15] (Ref. 2), SAFETY assume that Engineered Safety Feature systems are OPERABLE. The **ANALYSES** DC electrical power system provides normal and emergency DC electrical power for the diesel generators (DGs), emergency auxiliaries, and control and switching during all MODES of operation. The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY. The OPERABILITY of the minimum DC electrical power sources during MODES 4 and 5 and during movement of irradiated fuel assemblies ensures that: The facility can be maintained in the shutdown or refueling a. condition for extended periods; Sufficient instrumentation and control capability is available for b. monitoring and maintaining the unit status; and Adequate DC electrical power is provided to mitigate events C. postulated during shutdown, such as an inadvertent draindown of the vessel or a fuel handling accident. The DC sources satisfy Criterion 3 of the NRC Policy Statement. LCO The DC electrical power subsystems — with: 1) each station service DC subsystem consisting of two 125 V batteries in series, two battery chargers, and the corresponding control equipment and interconnecting cabling; and 2) each DG DC subsystem consisting of one battery bank, one battery charger, and the corresponding control equipment and interconnecting cabling — are required to be OPERABLE to support required DC distribution subsystems required OPERABLE by LCO 3.8.10, "Distribution Systems — Shutdown." This requirement ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents and inadvertent reactor vessel draindown).

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#### **APPLICABILITY**

The DC electrical power sources required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment provide assurance that:

- Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core in case of an inadvertent draindown of the reactor vessel;
- b. Required features needed to mitigate a fuel handling accident are available;
- c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, and 3 are covered in LCO 3.8.4.

#### **ACTIONS**

## A.1, A.2, and A.3

--REVIEWER'S NOTE----

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both subsystems of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one subsystem of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as ACTION A.

Condition A represents one subsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

## ------REVIEWER'S NOTE-------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

#### ------REVIEWER'S NOTE------

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-

<u>Informed Decisionmaking: Technical Specifications."</u> Otherwise, the 72 hour Completion Time must be adopted.

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Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

#### BA.1, BA.2.1, BA.2.2, BA.2.3, and BA.2.4

If more than one DC distribution subsystem is required according to LCO 3.8.10, the DC subsystems remaining OPERABLE with one or more DC power sources inoperable may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS, fuel movement, and operations with a potential for draining the reactor vessel. By allowance of the option to declare required features inoperable with associated DC power sources inoperable, appropriate restrictions are implemented in accordance with the affected system LCOs' ACTIONS. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and any activities that could result in inadvertent draining of the reactor vessel).

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystems and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the plant safety systems.

# ACTIONS (continued)

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the plant safety systems may be without sufficient power.

# SURVEILLANCE REQUIREMENTS

# SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.38. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

#### REFERENCES

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [15].

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

## B 3.8.6 Battery Cell-Parameters

#### **BASES**

#### **BACKGROUND**

This LCO delineates the limits on <u>battery float current as well as</u> electrolyte temperature, level, <u>and</u> float voltage, <u>and specific gravity</u> for the DC electrical power subsystems batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources — Operating," and LCO 3.8.5, "DC Sources — Shutdown." <u>In addition to the limitations of this Specification, the [licensee controlled program] also implements a program specified in Specification 5.5.14 for monitoring various battery parameters.</u>

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in FSAR, Chapter [6] (Ref. 43) and Chapter [15] (Ref. 42), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power subsystems provide normal and emergency DC electrical power for the diesel generators (DGs), emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one division subsystem of DC sources OPERABLE during accident conditions, in the event of:

- a. An assumed loss of all offsite AC or all onsite AC power; and
- b. A worst case single failure.

Since battery cell-parameters support the operation of the DC electrical power subsystems, they satisfy Criterion 3 of the NRC Policy Statement.

Battery Cell-Parameters B 3.8.6

#### LCO

Battery cell-parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Electrolyte Battery parameter limits are conservatively established, allowing continued DC electrical system function even with Category A and B-limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.14.

#### APPLICABILITY

The battery cell-parameters are required solely for the support of the associated DC electrical power subsystem. Therefore, battery electrolyte parameter limits are is only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussions in Bases for LCO 3.8.4 and LCO 3.8.5.

#### **ACTIONS**

#### A.1. A.2. and A.3

With one or more cells in one or more batteries in one subsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

#### B.1 and B.2

One or more batteries in one subsystem with float > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "OR" statement in Condition F is applicable and the battery must be declared inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the

battery will be restored to its fully charged condition (Required Action B.2) from any discharge that might have occurred due to a temporary loss of the battery charger.

# -----REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

#### C.1, C.2, and C.3

risk.

With one or more batteries in one subsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.14, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.14.b item to initiate

action to equalize and test in accordance with manufacturer's recommendation. They are performed following the restoration of the electrolyte level to above the top of the plates. Based on the results of the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

#### D.1

With one or more batteries in one subsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

# <u>E.1</u>

With one or more batteries in redundant subsystem s with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one subsystem within 2 hours.

#### A.1, A.2, and A.3

With parameters of one or more cells in one or more batteries not within limits (i.e., Category A limits not met or Category B limits not met, or Category A and B limits not met) but within the Category C limits specified in Table 3.8.6-1, the battery is degraded but there is still sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of Category A or B limits not met, and continued operation is permitted for a limited period.

The pilot cell electrolyte level and float voltage are required to be verified to meet the Category C limits within 1 hour (Required Action A.1). This check provides a quick indication of the status of the remainder of the battery cells. One hour provides time to inspect the electrolyte level and to confirm the float voltage of the pilot cells. One hour is considered a reasonable amount of time to perform the required verification.

Battery Cell-Parameters B 3.8.6

Verification that the Category C limits are met (Required Action A.2) provides assurance that during the time needed to restore the parameters to the Category A and B limits, the battery is still capable of performing its intended function. A period of 24 hours is allowed to complete the initial verification because specific gravity measurements must be obtained for each connected cell. Taking into consideration both the time required to perform the required verification and the assurance that the battery cell parameters are not severely degraded, this time is considered reasonable. The verification is repeated at 7 day intervals until the parameters are restored to Category A and B limits. This periodic verification is consistent with the normal Frequency of pilot cell Surveillances.

Continued operation is only permitted for 31 days before battery cell parameters must be restored to within Category A and B limits. Taking into consideration that, while battery capacity is degraded, sufficient capacity exists to perform the intended function and to allow time to fully restore the battery cell parameters to normal limits, this time is acceptable for operation prior to declaring the DC batteries inoperable.

# ACTIONS (continued)

# <u>F₿.1</u>

When any battery parameter is outside the <u>allowances of the Required</u> <u>Actions for Condition A, B, C, D, or ECategory C limit for any connected</u> <u>cell</u>, sufficient capacity to supply the maximum expected load requirement is not ensured and the corresponding <u>battery DC electrical power</u> <u>subsystem</u> must be declared inoperable. Additionally, <u>discovering one or</u> more batteries in one subsystem with one or more battery cells float <u>voltage less than [2.07] V and float current greater than [2] amps</u> <u>indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately other potentially extreme conditions, such as not completing the Required Actions of Condition A within the required Completion Time or average electrolyte temperature of representative cells falling below 60°F, also are cause for immediately declaring the associated DC electrical power subsystem inoperable.</u>

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The equipment used to monitor float current must have the necessary accuracy and capability to measure electrical currents in the expected range. The float current requirements are based on the float current indicative of a charged battery. The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

#### SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge.

which could eventually render the battery inoperable. Float voltages in this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.14. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

## SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The minimum design electrolyte level is the minimum level indication mark on the battery cell jar. The Frequency is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provided the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

### SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance, the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity ≥ 100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 1), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is 10% below the manufacturer's rating. All these Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems.

#### SR 3.8.6.1

This SR verifies that Category A battery cell parameters are consistent with IEEE-450 (Ref. 3), which recommends regular battery inspections (at least one per month) including voltage, specific gravity, and electrolyte temperature of pilot cells.

#### SR 3.8.6.2

The quarterly inspection of specific gravity and voltage is consistent with IEEE-450 (Ref. 3). In addition, within 24 hours of a battery discharge < [110] V or a battery overcharge > [150] V, the battery must be demonstrated to meet Category B limits. Transients, such as motor starting transients, which may momentarily cause battery voltage to drop to ≤ [110] V, do not constitute a battery discharge provided the battery terminal voltage and float current return to pre-transient values. This inspection is also consistent with IEEE-450 (Ref. 3), which recommends special inspections following a severe discharge or overcharge, to ensure that no significant degradation of the battery occurs as a consequence of such discharge or overcharge.

#### SR 3.8.6.3

This Surveillance verification that the average temperature of representative cells is within limits is consistent with a recommendation of IEEE-450 (Ref. 3) that states that the temperature of electrolytes in representative cells should be determined on a quarterly basis.

Lower than normal temperatures act to inhibit or reduce battery capacity. This SR ensures that the operating temperatures remain within an acceptable operating range. This limit is based on manufacturer's recommendations.

# SURVEILLANCE REQUIREMENTS (continued)

## Table 3.8.6-1

This table delineates the limits on electrolyte level, float voltage, and specific gravity for three different categories. The meaning of each category is discussed below.

Category A defines the normal parameter limit for each designed pilot cell in each battery. The cells selected as pilot cells are those whose temperature, voltage, and electrolyte specific gravity approximate the state of charge of the entire battery.

The Category A limits specified for electrolyte level are based on manufacturer's recommendations and are consistent with the guidance in IEEE-450 (Ref. 3), with the extra ¼ inch allowance above the high water level indication for operating margin to account for temperature and charge effects. In addition to this allowance, footnote a to Table 3.8.6-1 permits the electrolyte level to be above the specified maximum level during equalizing charge, provided it is not overflowing. These limits ensure that the plates suffer no physical damage, and that adequate electron transfer capability is maintained in the event of transient conditions. IEEE-450 (Ref. 3) recommends that electrolyte level readings should be made only after the battery has been at float charge for at least 72 hours.

The Category A limit specified for float voltage is ≥ 2.13 V per cell. This value is based on the recommendation of IEEE-450 (Ref. 3), which states that prolonged operation of cells below 2.13 V can reduce the life expectancy of cells.

The Category A limit specified for specific gravity for each pilot cell is ≥ [1.200] (0.015 below the manufacturer's fully charged nominal specific gravity or a battery charging current that had stabilized at a low value). This value is characteristic of a charged cell with adequate capacity. According to IEEE-450 (Ref. 3), the specific gravity readings are based on a temperature of 77°F (25°C).

The specific gravity readings are corrected for actual electrolyte temperature and level. For each 3°F (1.67°C) above 77°F (25°C), 1 point (0.001) is added to the reading; 1 point is subtracted for each 3°F below 77°F. The specific gravity of the electrolyte in a cell increases with a loss of water due to electrolysis or evaporation. Level correction will be in accordance with manufacturer's recommendations.

Category B defines the normal parameter limits for each connected cell.

The term "connected cell" excludes any battery cell that may be jumpered out.

## SURVEILLANCE REQUIREMENTS (continued)

The Category B limits specified for electrolyte level and float voltage are the same as those specified for Category A and have been discussed above. The Category B limit specified for specific gravity for each connected cell is ≥ 1.195 (0.020 below the manufacturer's fully charged, nominal specific gravity) with the average of all connected cells [1.205] (0.010 below the manufacturer's fully charged, nominal specific gravity). These values are based on manufacturer's recommendations. The minimum specific gravity value required for each cell ensures that the effects of a highly charged or newly installed cell do not mask overall degradation of the battery.

Category C defines the limits for each connected cell. These values, although reduced, provide assurance that sufficient capacity exists to perform the intended function and maintain a margin of safety. When any battery parameter is outside the Category C limits, the assurance of sufficient capacity described above no longer exists, and the battery must be declared inoperable.

The Category C limit specified for electrolyte level (above the top of the plates and not overflowing) ensures that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C Allowable Value for voltage is based on IEEE-450 (Ref. 3), which states that a cell voltage of 2.07 V or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limit on average specific gravity [≥ 1.195], is based on manufacturer's recommendations (0.020 below the manufacturer's recommended fully charged, nominal specific gravity). In addition to that limit, it is required that the specific gravity for each connected cell must be no less than 0.020 below the average of all connected cells. This limit ensures that the effect of a highly charged or new cell does not mask overall degradation of the battery.

The footnotes to Table 3.8.6-1 that apply to specific gravity are applicable to Category A, B, and C specific gravity. Footnote (b) of Table 3.8.6-1 requires the above mentioned correction for electrolyte level and temperature, with the exception that level correction is not required when battery charging current, while on float charge, is < 1 amp for station service batteries and < 0.5 amp for DG batteries. This current provides, in general, an indication of overall battery condition.

# SURVEILLANCE REQUIREMENTS (continued)

Because of specific gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger current is an acceptable alternative to specific gravity measurement for determining the state of charge of the designated pilot cell. This phenomenon is discussed in IEEE 450 (Ref. 3). Footnote (c) to Table 3.8.6-1 allows the float charge current to be used as an alternate to specific gravity for up to 7 days following a battery recharge. Within [7] days, each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less than [7] days.

[Reviewer's Note: The value of [2] amps used in footnote (b) and (c) is the nominal value for float current established by the battery vendor as representing a fully charged battery with an allowance for overall battery condition.]

| REFERENCES | 1. IEEE-450.                |
|------------|-----------------------------|
|            | 2. FSAR, Chapter [8].       |
|            | 34. FSAR, Chapter [6].      |
|            | 42. FSAR, Chapter [15].     |
|            | 3. IEEE Standard 450, 1987. |
|            | 5. IEEE Standard 485, 1983. |

# 3.8 ELECTRICAL POWER SYSTEMS

#### DC Sources - Operating 3.8.4

The [Division 1], [Division 2], and [Division 3] DC electrical power subsystems shall be OPERABLE. LCO 3.8.4

APPLICABILITY: MODES 1, 2, and 3.

# **ACTIONS**

| CONDITION                                                                                                |              | REQUIRED ACTION                                                                                     | COMPLETION TIME     |
|----------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------------------------------|---------------------|
| A. One [or two] battery charger[s] on one subsystem inoperable.                                          | <u>A.1</u>   | Restore battery terminal voltage to greater than or equal to the minimum established float voltage. | 2 hours             |
|                                                                                                          | AND          |                                                                                                     |                     |
|                                                                                                          | <u>A.2</u>   | Verify battery float current ≤ [2] amps.                                                            | Once per [12] hours |
|                                                                                                          | AND          |                                                                                                     |                     |
|                                                                                                          | <u>A.3</u>   | Restore battery charger[s] to OPERABLE status.                                                      | [72] hours          |
| [B. One [or two] batter[y][ies on one subsystem] inoperable.                                             | <u>B.1</u>   | Restore batter[y][ies] to OPERABLE status.                                                          | [2] hours ]         |
| CA.[Division 1 or 2] DC electrical power subsystem inoperable for reasons other than Condition A [or B]. | <u>C</u> A.1 | Restore [Division 1 and 2]<br>DC electrical power<br>subsystems to OPERABLE<br>status.              | [2] hours           |
| DB.[Division 3] DC electrical power subsystem inoperable.                                                | <u>D</u> B.1 | Declare High Pressure<br>Core Spray System<br>[and 2C Standby Service<br>Water System] inoperable.  | Immediately         |

| CONDITION                                                  |              | REQUIRED ACTION | COMPLETION TIME |  |
|------------------------------------------------------------|--------------|-----------------|-----------------|--|
| EC.Required Action and associated Completion Time not met. | <u>E</u> C.1 | Be in MODE 3.   | 12 hours        |  |
|                                                            | <u>E</u> C.2 | Be in MODE 4.   | 36 hours        |  |

|                       | SURVEILLANCE                                                                                                                                                                                                                | FREQUENCY          |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| SR 3.8.4.1            | Verify battery terminal voltage is greater than or equal to the minimum established float voltage≥ [129] V on float charge.                                                                                                 | 7 days             |
| SR 3.8.4.2            | Verify no visible corrosion at battery terminals and connectors.                                                                                                                                                            | <del>92 days</del> |
|                       | <u>OR</u>                                                                                                                                                                                                                   |                    |
|                       | Verify battery connection resistance [is ≤ [1.5 E-4 ohm] for inter-cell connections, ≤ [1.5 E-4 ohm] for inter-rack connections, ≤ [1.5 E-4 ohm] for inter-tier connections, and ≤ [1.5 E-4 ohm] for terminal connections]. |                    |
| SR 3.8.4.3            | Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration.                                                                                                        | [12] months        |
| SR 3.8.4.4            | Remove visible corrosion and verify battery cell to cell and terminal connections are [clean and tight, and] coated with anti-corrosion material.                                                                           | [12] months        |
| <del>SR 3.8.4.5</del> | Verify battery connection resistance [is ≤ [1.5 E-4 ohm] for inter-cell connections, ≤ [1.5 E-4 ohm] for inter-rack connections, ≤ [1.5 E-4 ohm] for inter-tier connections, and ≤ [1.5 E-4 ohm] for terminal connections]. | [12] months        |
| SR 3.8.4. <u>2</u> 6  | This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.                                                                                        |                    |
|                       | Verify each [required] battery charger supplies ≥ [400] amps at greater than or equal to the minimum established float voltage ≥ [250/125] V for ≥ [8] hours.                                                               | [18 months]        |

| SURVEILLANCE                                                                                                                                                                                                                                                               | FREQUENCY |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| Verify each battery charger can recharge the battery to the fully charged state within [24] hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis event discharge state. |           |

|                      | SURVEILLANCE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | FREQUENCY   |
|----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| SR 3.8.4. <u>3</u> 7 | <ol> <li>The modified performance discharge test in SR 3.8.6.64.8 may be performed in lieu of the service test in SR 3.8.4.37 once per 60 months.</li> <li>This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.</li> <li>Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.</li> </ol> | [18 months] |

|            | SURVEILLANCE                                                                                                                                          | FREQUENCY                                                                                                                                                                                                                                           |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.4.8 | NOTE  This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.            |                                                                                                                                                                                                                                                     |
|            | Verify battery capacity ≥ [80]% of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | AND  12 months when battery shows degradation or has reached [85]% of expected life with capacity < 100% of manufacturer's rating  AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating |

# 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.5 DC Sources - Shutdown

LCO 3.8.5 DC electrical power subsystem(s) shall be OPERABLE to support the

electrical power distribution subsystem(s) required by LCO 3.8.10,

"Distribution Systems — Shutdown."

APPLICABILITY: MODES 4 and 5,

During movement of irradiated fuel assemblies in the [primary or

secondary] containment.

# **ACTIONS**

| CONDITION                                                             | REQUIRED ACTION                                                                                           | COMPLETION TIME     |
|-----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------|
| [A. One [or two] battery charger[s on one subsystem] inoperable.  AND | A.1 Restore battery terminal voltage to greater than or equal to the minimum established float voltage.   | 2 hours             |
| The redundant subsystem battery and charger[s] OPERABLE.              | AND  A.2 Verify battery float current ≤ [2] amps.  AND                                                    | Once per [12] hours |
|                                                                       | A.3 Restore battery charger[s] to OPERABLE status.                                                        | [72] hours          |
| BA. One or more required DC electrical power subsystems inoperable.   | BA.1 Declare affected required feature(s) inoperable.  OR                                                 | Immediately         |
|                                                                       | BA.2.1 Suspend CORE ALTERATIONS.                                                                          | Immediately         |
|                                                                       | <u>AND</u>                                                                                                |                     |
|                                                                       | BA.2.2 Suspend movement of<br>irradiated fuel assemblies in<br>the [primary or secondary]<br>containment. | Immediately         |

| CONDITION | REQUIRED ACTION                                                                                     | COMPLETION TIME |  |
|-----------|-----------------------------------------------------------------------------------------------------|-----------------|--|
|           | AND  BA.2.3 Initiate action to suspend operations with a potential for draining the reactor vessel. | Immediately     |  |
|           | AND  BA.2.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status.  | Immediately     |  |

|            | SURVEILLANCE                                                                                                                                                                                                                                                           | FREQUENCY                               |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| SR 3.8.5.1 | The following SRs are not required to be performed: SR 3.8.4.26, and SR 3.8.4.37, and SR 3.8.4.8.  For DC sources required to be OPERABLE, the following SRs are applicable:  SR 3.8.4.1 SR 3.8.4.4 SR 3.8.4.7 SR 3.8.4.2 SR 3.8.4.5 SR 3.8.4.8. SR 3.8.4.3 SR 3.8.4.6 | In accordance<br>with applicable<br>SRs |

#### 3.8 ELECTRICAL POWER SYSTEMS

# 3.8.6 Battery Cell-Parameters

LCO 3.8.6 Battery cell-parameters for the [Division 1, 2, and 3] electrical power

subsystem batteries shall be within the limits of Table 3.8.6-1.

APPLICABILITY: When associated DC electrical power subsystems are required to be

OPERABLE.

| ACTIONS                                               |
|-------------------------------------------------------|
| NOTFNOTF                                              |
| IIOIL                                                 |
| Separate Condition entry is allowed for each battery. |

CONDITION REQUIRED ACTION **COMPLETION TIME** 1 hour A. One or more batteries A.1— Verify pilot cell[s] electrolyte level and float voltage meet with one or more battery cell parameters not Table 3.8.6-1 Category C within Category A or B limits. limits. <u>AN</u>D Verify battery cell 24 hours parameters meet Table 3.8.6-1 Category C <u>AND</u> limits. Once per 7 days thereafter AND A.3-Restore battery cell 31 days parameters to Category A and B limits of

Table 3.8.6-1.

# ACTIONS (continued)

| CONDITION                                                                                         | REQUIRED ACTION                                                                                           | COMPLETION TIME |
|---------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|-----------------|
| A. One [or two] batter[y][ies on one subsystem] with                                              | A.1 Perform SR 3.8.4.1.                                                                                   | 2 hours         |
| one or more battery cells float voltage < [2.07] V.                                               | AND AND AND                                                                                               | 2 hours         |
|                                                                                                   | AND  A.3 Restore affected cell  voltage ≥ [2.07] V.                                                       | 24 hours        |
| B. One [or two] batter[y][ies on one subsystem] with float current > [2] amps.                    | B.1 Perform SR 3.8.4.1.  AND                                                                              | 2 hours         |
|                                                                                                   | B.2 Restore battery float current to ≤ [2] amps.                                                          | [12] hours      |
| Required Action C.2 shall be completed if electrolyte level was below the top of plates.          | Required Actions C.1 and C.2 are only applicable if electrolyte level was below the top of plates.        |                 |
| C. One [or two] batter[y][ies on one subsystem] with one or more cells                            | C.1 Restore electrolyte level to above top of plates.                                                     | 8 hours         |
| electrolyte level less than minimum established design limits.                                    | C.2 Verify no evidence of leakage.                                                                        | 12 hours        |
|                                                                                                   | AND                                                                                                       |                 |
|                                                                                                   | C.3 Restore electrolyte level to greater than or equal to minimum established design limits.              | <u>31 days</u>  |
| D. One [or two] batter[y][ies on one subsystem] with pilot cell electrolyte temperature less than | D.1 Restore battery pilot cell temperature to greater than or equal to minimum established design limits. | 12 hours        |

| minimum established design limits.                                                                                                                                                                                                   |              |                                                                             |             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------------------------------------------------------------------|-------------|
| E. One or more batteries in redundant subsystems with battery parameters not within limits.                                                                                                                                          | <u>E.1</u>   | Restore battery parameters for batteries in one subsystem to within limits. | 2 hours     |
| FB. Required Action and associated Completion Time of Condition A, B, C, D, or E not met.                                                                                                                                            | <u>F</u> B.1 | Declare associated battery inoperable.                                      | Immediately |
| <u>OR</u>                                                                                                                                                                                                                            |              |                                                                             |             |
| One [or two] batter[y][ies on one subsystem] with one or more battery cells float voltage < [2.07] V and float current > [2] amps.  One or more batteries with average electrolyte temperature of the representative cells < [60]°F. |              |                                                                             |             |
| — <u>OR</u>                                                                                                                                                                                                                          |              |                                                                             |             |
| One or more batteries with one or more battery cell parameters not within Category C values.                                                                                                                                         |              |                                                                             |             |

|            | SURVEILLANCE                                                         | FREQUENCY |
|------------|----------------------------------------------------------------------|-----------|
| SR 3.8.6.1 | Verify battery cell parameters meet Table 3.8.6-1 Category A limits. | 7 days    |

# SURVEILLANCE REQUIREMENTS (continued)

|            | SURVEILLANCE                                                                                                             | FREQUENCY                                                                                                                          |
|------------|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.2 | Verify battery cell parameters meet Table 3.8.6-1 Category B limits.                                                     | 92 days  AND  Once within 24 hours after battery discharge < [110] V  AND  Once within 24 hours after battery overcharge > [150] V |
| SR 3.8.6.3 | Verify average electrolyte temperature of representative cells is ≥ [60]°F.                                              | <del>92 days</del>                                                                                                                 |
| SR 3.8.6.1 | Not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1.   | 7 days                                                                                                                             |
| SR 3.8.6.2 | Verify each battery float current is $\leq$ [2] amps.  Verify each battery pilot cell float voltage is $\geq$ [2.07]  V. | 31 days                                                                                                                            |
| SR 3.8.6.3 | Verify each battery connected cell electrolyte level is greater than or equal to minimum established design limits.      | <u>31 days</u>                                                                                                                     |
| SR 3.8.6.4 | Verify each battery pilot cell temperature is greater than or equal to minimum established design limits.                | 31 days                                                                                                                            |
| SR 3.8.6.5 | Verify each battery connected cell float voltage is ≥ [2.07] V.                                                          | 92 days                                                                                                                            |
| BWD/6 STS  | 3864                                                                                                                     | Pay 1.0 04/07/05                                                                                                                   |

|            |                                                                                                                                                          | 1                                                                                                                                                 |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| SR 3.8.6.6 | This Surveillance shall not normally be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR.            |                                                                                                                                                   |
|            | Verify battery capacity is ≥ [80%] of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test. | 60 months  AND  12 months when battery shows degradation, or has reached [85]% of the expected life with capacity < 100% of manufacturer's rating |
|            |                                                                                                                                                          | AND  24 months when battery has reached [85]% of the expected life with capacity ≥ 100% of manufacturer's rating                                  |

# Table 3.8.6-1 (page 1 of 1) Battery Cell Parameter Requirements

| PARAMETER              | CATEGORY A:<br>LIMITS FOR EACH<br>DESIGNATED<br>PILOT-CELL                         | CATEGORY B:<br>LIMITS FOR EACH<br>CONNECTED CELL                                   | CATEGORY C:<br>ALLOWABLE LIMITS<br>FOR EACH<br>CONNECTED CELL                                           |
|------------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Electrolyte Level      | > Minimum level indication mark, and ½ inch above maximum level indication mark(a) | > Minimum level indication mark, and ½ inch above maximum level indication mark(a) | Above top of plates, and not overflowing                                                                |
| Float Voltage          | ≥ 2.13 V                                                                           | ≥ 2.13 V                                                                           | > 2.07 V                                                                                                |
| Specific Gravity(b)(c) | <u>≥ [1.195]</u>                                                                   | ≥ [1.190]  AND  Average of all connected cells > [1.200]                           | Not more than 0.020 below average of all connected cells  AND  Average of all connected cells ≥ [1.190] |

- (a) It is acceptable for the electrolyte level to temporarily increase above the specified maximum level during equalizing charges provided it is not overflowing.
- (b) Corrected for electrolyte temperature and level. Level correction is not required, however, when battery charging is < [2] amps when on float charge.
- (c) A battery charging current of < [2] amps when on float charge is acceptable for meeting specific gravity limits following a battery recharge, for a maximum of [7] days. When charging current is used to satisfy specific gravity requirements, specific gravity of each connected cell shall be measured prior to expiration of the [7] day allowance.

# 5.5 Programs and Manuals

| 5.5.14 | Battery Monitoring and Maintenance Program                                                                                     |
|--------|--------------------------------------------------------------------------------------------------------------------------------|
|        | This Program provides for battery restoration and maintenance, which includes the following:                                   |
|        | a. Actions to restore battery cells with float voltage < [2.13] V;                                                             |
|        | b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plates; and |
|        | c. Actions to verify that the remaining cells are > [2.07] V when a pilot cell or cells have been found to be < [2.13] V.      |

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

B 3.8.4 DC Sources - Operating

#### **BASES**

#### **BACKGROUND**

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment. As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the requirements of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The 125 VDC electrical power system consists of three independent Class 1E DC electrical power subsystems, Divisions 1, 2, and 3. Each subsystem consists of a battery, associated battery charger(s), and all the associated control equipment and interconnecting cabling.

During normal operation, the DC loads are powered from the battery chargers with the batteries floating on the system. In case of loss of normal power to the battery charger, the DC loads are automatically powered from the Engineered Safety Feature (ESF) batteries.

Each of the Division 1 and 2 electrical power subsystems provides the control power for its associated Class 1E AC power load group, 4.16 kV switchgear, and 480 V load centers. Also, these DC subsystems provide DC electrical power to the inverters, which in turn power the AC vital buses. The Division 3 DC electrical power subsystem provides DC motive and control power as required for the High Pressure Core Spray (HPCS) System diesel generator (DG) set control and protection.

The DC power distribution system is described in more detail in Bases for LCO 3.8.9, "Distribution Systems - Operating," and LCO 3.8.10, "Distribution Systems - Shutdown."

Each Division 1 and 2 battery has adequate storage capacity to carry the required load continuously for at least 4 hours and to perform three complete cycles of intermittent loads as discussed in the FSAR, Section [8.3.2] (Ref. 4).

The Division 3 battery has adequate storage to carry the required load continuously for at least 2 hours (Ref. 4).

# BACKGROUND (continued)

Each DC battery subsystem is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystems to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. [There is no sharing between redundant Class 1E subsystems such as batteries, battery chargers, or distribution panels.]

Each battery has adequate storage capacity to meet the duty cycle(s) discussed in the FSAR, Chapter [8] (Ref 4). The battery is designed with additional capacity above that required by the design duty cycle to allow for temperature variations and other factors.

The batteries for a DC electrical power subsystem are sized to produce required capacity at 80% of nameplate rating, corresponding to warranted capacity at end of life cycles and the 100% design demand. The <a href="minimum">minimum</a> voltage design limit is 1.75 V per cell (Ref. 4).

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for a [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential, which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 4).

Each battery charger of Division 1 and 2 DC electrical power subsystem battery charger has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger has sufficient excess capacity to restore the battery bank from the design minimum charge to its fully charged state within [12] hours while supplying normal steady state loads (Ref. 4).

The battery charger of Division 3 DC electrical power subsystem <a href="battery charger">battery charger</a> has sufficient <a href="excess">excess</a> capacity to restore the battery bank from the design minimum charge to its fully charged state in [8] hours while supplying normal steady state loads (Ref. 4).

The battery charger is normally in the float-charge mode. Float-charge is the condition in which the charger is supplying the connected loads and the battery cells are receiving adequate current to optimally charge the battery. This assures the internal losses of a battery are overcome and the battery is maintained in a fully charged state.

When desired, the charger can be placed in the equalize mode. The equalize mode is at a higher voltage than the float mode and charging current is correspondingly higher. The battery charger is operated in the equalize mode after a battery discharge or for routine maintenance. Following a battery discharge, the battery recharge characteristic accepts current at the current limit of the battery charger (if the discharge was significant, e.g., following a battery service test) until the battery terminal voltage approaches the charger voltage setpoint. Charging current then reduces exponentially during the remainder of the recharge cycle. Lead-calcium batteries have recharge efficiencies of greater than 95%, so once at least 105% of the ampere-hours discharged have been returned, the battery capacity would be restored to the same condition as it was prior to the discharge. This can be monitored by direct observation of the exponentially decaying charging current or by evaluating the amp-hours discharged from the battery and amp-hours returned to the battery.

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the FSAR, Chapter [6] (Ref. 45) and Chapter [15] (Ref. 56), assume that ESF systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining DC sources OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC power or of all onsite AC power;
   and
- b. A worst case single failure.

The DC sources satisfy Criterion 3 of the NRC Policy Statement.

#### LCO

The DC electrical power subsystems, each subsystem consisting of one battery, one battery charger, and the corresponding control equipment and interconnecting cabling supplying power to the associated bus within the divisions, are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence (AOO) or a postulated DBA. Loss of any DC electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4).

## **APPLICABILITY**

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, and 3 to ensure safe unit operation and to ensure that:

- Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 4 and 5 are addressed in the Bases for LCO 3.8.5, "DC Sources - Shutdown."

#### **ACTIONS**

#### A.1, A.2, and A.3

Condition A represents one subsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

## ------REVIEWER'S NOTE------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it is now fully capable of supplying the maximum expected load requirement. The [2] amp value is based on returning the battery to [95]% charge and assumes a [5]% design margin for the battery. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

-----REVIEWER'S NOTE-----

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications," and RG 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."

Alternatively, the 7 day Completion Time can be justified by an acceptable method, such as a regulatory commitment that an alternate means to charge the batteries will be available that is capable of being

supplied power from a power source that is independent of the offsite power supply. Otherwise, the 72 hour Completion Time must be adopted.

Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

#### B.1

#### -----REVIEWER'S NOTES-----

- The 2 hour Completion Times of Required Actions B.1 and C.1 are in brackets. Any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177 and RG 1.174.
- 2. Condition B is included if Required Action B.1 (One [or two] batter[y][ies on one subsystem] inoperable) and Required Action C.1 (One DC electrical power subsystem inoperable for reasons other than Condition A [or B]) would have different Completion Times. If the plant design supports different Completion Times when a battery is inoperable but the charger is OPERABLE, then Condition B is used. If not, Condition B is deleted and only Condition C is used.

Condition B represents one subsystem with one [or two] batter[y][ies] inoperable. With one for twol batter[v][ies] inoperable, the DC bus is being supplied by the OPERABLE battery charger[s]. Any event that results in a loss of the AC bus supporting the battery charger[s] will also result in loss of DC to that subsystem. Recovery of the AC bus, especially if it is due to a loss of offsite power, will be hampered by the fact that many of the components necessary for the recovery (e.g., diesel generator control and field flash, AC load shed and diesel generator output circuit breakers, etc.) likely rely upon the batter[y][ies]. In addition the energization transients of any DC loads that are beyond the capability of the battery charger[s] and normally require the assistance of the batter[v][ies] will not be able to be brought online. The [2] hour limit allows sufficient time to effect restoration of an inoperable battery given that the majority of the conditions that lead to battery inoperability (e.g., loss of battery charger, battery cell voltage less than [2.07] V, etc.) are identified in Specifications 3.8.4, 3.8.5, and 3.8.6 together with additional specific completion times.

CA.1

DC Sources - Operating B 3.8.4

Condition <u>CA</u> represents one <u>division\_subsystem</u> with a loss of ability to completely respond to an event, and a potential loss of ability to remain energized during normal operation. It is, therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected<u>division\_subsystem</u>. The 2 hour limit is consistent with the allowed time for an inoperable DC distribution system<u>division\_subsystem</u>.

If one of the required [Division 1 or 2] DC electrical power subsystems is inoperable for reasons other than Condition A or B (e.g., inoperable battery, inoperable battery charger, or inoperable battery charger and associated inoperable battery), the remaining DC electrical power subsystems have the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure could, however, result in the loss of minimum necessary DC electrical subsystems, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 67) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

# ACTIONS (continued)

# <u>D₿.1</u>

With the Division 3 DC electrical power subsystem inoperable, the HPCS and 2C Standby Service Water System may be incapable of performing their intended functions and must be immediately declared inoperable. This declaration also requires entry into applicable Conditions and Required Actions of LCO 3.5.1, "ECCS - Operating," [and LCO 3.7.1, "Standby Service Water (SSW)] System and [Ultimate Heat Sink (UHS)"]].

#### EC.1 and EC.2

If the DC electrical power subsystem cannot be restored to OPERABLE status within the associated Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 4 is consistent with the time required in Regulatory Guide 1.93 (Ref. 67).

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.4.1

Verifying battery terminal voltage while on float charge helps to ensure the effectiveness of the battery chargers, which support he ability of the batteries to perform their intended function charging system and the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery (or battery cell) and maintain the battery (or battery cell) in a fully charged state while supplying the continuous steady state loads of the associated DC subsystem. On float charge, battery cells will receive adequate current to optimally charge the battery. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the minimum float voltage established by the battery manufacturer ([2.20] Vpc times the number of connected cells or [127.6] V for a 58 cell battery at the battery terminals). This voltage maintains the battery plates in a condition that supports maintaining the grid life. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The 7 day Frequency is consistent with manufacturer's recommendations and IEEE-450 (Ref. 8).

#### SR 3.8.4.2

DC Sources - Operating B 3.8.4

Visual inspection to detect corrosion of the battery cells and connections, or measurement of the resistance of each inter-cell, inter-rack, inter-tier, and terminal connection, provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

## SURVEILLANCE REQUIREMENTS (continued)

The limits established for this SR must be no more than 20% above the resistance as measured during installation, or not above the ceiling value established by the manufacturer.

The Surveillance Frequency for these inspections, which can detect conditions that can cause power losses due to resistance heating, is 92 days. This Frequency is considered acceptable based on operating experience related to detecting corrosion trends.

#### SR 3.8.4.3

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

[The 12 month Frequency of this SR is consistent with IEEE-450 (Ref. 8), which recommends detailed visual inspection of cell condition and inspection of cell to cell and terminal connection resistance on a yearly basis.]

#### SR 3.8.4.4 and SR 3.8.4.5

Visual inspection and resistance measurements of inter-cell, inter-rack, inter-tier, and terminal connections provides an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The anti-corrosion material is used to ensure good electrical connections and to reduce terminal deterioration. The visual inspection for corrosion is not intended to require removal of and inspection under each terminal connection.

The removal of visible corrosion is a preventive maintenance SR. The presence of visible corrosion does not necessarily represent a failure of this SR, provided visible corrosion is removed during performance of this Surveillance.

Reviewer's Note: The requirement to verify that terminal connections are clean and tight applies only to nickel cadmium batteries as per IEEE Standard P1106, "IEEE Recommended Practice for Installation, Maintenance, Testing and Replacement of Vented Nickel - Cadmium Batteries for Stationary Applications." This requirement may be removed for lead acid batteries.

## SURVEILLANCE REQUIREMENTS (continued)

The connection resistance limits for this SR must be no more than 20% above the resistance as measured during installation, or not above the ceiling value established by the manufacturer.

[The 12 month Frequency of these SRs is consistent with IEEE-450 (Ref. 8), which recommends detailed visual inspection of cell condition and inspection of cell to cell and terminal connection resistance on a yearly basis.]

#### SR 3.8.4.26

This SR verifies Battery charger capability requirements are based on the design capacity of the battery chargers (Ref. 4). According to Regulatory Guide 1.32 (Ref. 9), the battery charger supply is required recommended to be based on the largest combined demands of the various steady state loads and the charging capacity to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensure that these requirements can be satisfied.

This SR provides two options. One option requires that each battery charger be capable of supplying [400] amps at the minimum established float voltage for [8] hours. The ampere requirements are based on the output rating of the chargers. The voltage requirements are based on the charger voltage level after a response to a loss of AC power. The time period is sufficient for the charger temperature to have stabilized and to have been maintained for at least [2] hours.

The other option requires that each battery charger be capable of recharging the battery after a service test coincident with supplying the largest coincident demands of the various continuous steady state loads (irrespective of the status of the plant during which these demands occur). This level of loading may not normally be available following the battery service test and will need to be supplemented with additional loads. The duration for this test may be longer than the charger sizing criteria since the battery recharge is affected by float voltage, temperature, and the exponential decay in charging current. The battery is recharged when the measured charging current is ≤ [2] amps.

The Surveillance Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these 18 month intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

DC Sources - Operating B 3.8.4

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy the Surveillance.

# SR 3.8.4.37

A battery service test is a special test of the battery's capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length correspond to the design duty cycle requirements as specified in Reference 4.

# SURVEILLANCE REQUIREMENTS (continued)

The Surveillance Frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.32 (Ref. 9) and Regulatory Guide 1.129 (Ref. 10), which state that the battery service test should be performed during refueling operations or at some other outage, with intervals between tests not to exceed 18 months.

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test-once per 60 months.

The modified performance discharge test is a simulated duty cycle consisting of just two rates; the one minute rate published for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere hours removed by a rated one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test should remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

The reason for Note 2 is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy the Surveillance.

# SR 3.8.4.8

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

# SURVEILLANCE REQUIREMENTS (continued)

A battery modified performance discharge test is described in the Bases for SR 3.8.4.7. Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.4.8; however, only the modified performance discharge test may be used to satisfy SR 3.8.4.8 while satisfying the requirements of SR 3.8.4.7 at the same time.

The acceptance criteria for this Surveillance is consistent with IEEE-450 (Ref. 8) and IEEE-485 (Ref. 11). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements.

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity 100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 8), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is 10% below the manufacturer's rating. All these Frequencies are consistent with the recommendations in IEEE-450 (Ref. 8).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems. Credit may be taken for unplanned events that satisfy the Surveillance.

#### REFERENCES

- 1. 10 CFR 50, Appendix A, GDC 17.
- 2. Regulatory Guide 1.6, March 10, 1971.
- 3. IEEE Standard 308, 1978.
- 4. FSAR, Chapter [8.3.2].
- 5. FSAR, Chapter [6].
- 6. FSAR, Chapter [15].

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# **BASES**

# REFERENCES (continued)

- 7. Regulatory Guide 1.93, December 1974.
- 8. IEEE Standard 450, 1987.
- 89. Regulatory Guide 1.32, February 1977.
- <u>9</u>10. Regulatory Guide 1.129, December 1974.
- 11. IEEE Standard 485.

#### B 3.8 ELECTRICAL POWER SYSTEMS

#### B 3.8.5 DC Sources - Shutdown

# **BASES BACKGROUND** A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating." APPLICABLE The initial conditions of Design Basis Accident and transient analyses in the FSAR, Chapter [6] (Ref. 1) and Chapter [15] (Ref. 2), assume that SAFETY **ANALYSES** Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation. The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY. The OPERABILITY of the minimum DC electrical power sources during MODES 4 and 5 and during movement of irradiated fuel assemblies ensures that: The facility can be maintained in the shutdown or refueling a. condition for extended periods; Sufficient instrumentation and control capability is available for b. monitoring and maintaining the unit status; and

c. Adequate DC electrical power is provided to mitigate events postulated during shutdown, such as an inadvertent draindown of the vessel or a fuel handling accident.

The DC sources satisfy Criterion 3 of the NRC Policy Statement.

#### LCO

The DC electrical power subsystems, each consisting of [two] battery banks, [one or two] battery charger[s], and the corresponding control equipment and interconnecting cabling within the division, are required to be OPERABLE to support required divisions of Distribution System divisions required OPERABLE by LCO 3.8.10, "Distribution Systems - Shutdown." This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents and inadvertent reactor vessel draindown).

#### **APPLICABILITY**

The DC electrical power sources required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the [primary or secondary containment] provide assurance that:

- Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core in case of an inadvertent draindown of the reactor vessel;
- b. Required features needed to mitigate a fuel handling accident are available;
- c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, and 3 are covered in LCO 3.8.4.

#### **ACTIONS**

# A.1, A.2, and A.3

--REVIEWER'S NOTE-----

ACTION A is included only when plant-specific implementation of LCO 3.8.5 includes the potential to require both subsystems of the DC System to be OPERABLE. If plant-specific implementation results in LCO 3.8.5 requiring only one subsystem of the DC System to be OPERABLE, then ACTION A is omitted and ACTION B is renumbered as ACTION A.

Condition A represents one subsystem with one [or two] battery chargers inoperable (e.g., the voltage limit of SR 3.8.4.1 is not maintained). The ACTIONS provide a tiered response that focuses on returning the battery to the fully charged state and restoring a fully qualified charger to OPERABLE status in a reasonable time period. Required Action A.1 requires that the battery terminal voltage be restored to greater than or equal to the minimum established float voltage within 2 hours. This time provides for returning the inoperable charger to OPERABLE status or providing an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage. Restoring the battery terminal voltage to greater than or equal to the minimum established float voltage provides good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action A.2) from any discharge that might have occurred due to the charger inoperability.

-----REVIEWER'S NOTE-----

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery having terminal voltage of at least the minimum established float voltage indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown

with its own attendant risk.

If established battery terminal float voltage cannot be restored to greater than or equal to the minimum established float voltage within 2 hours, and the charger is not operating in the current-limiting mode, a faulty charger is indicated. A faulty charger that is incapable of maintaining established battery terminal float voltage does not provide assurance that it can revert to and operate properly in the current limit mode that is necessary during the recovery period following a battery discharge event that the DC system is designed for.

If the charger is operating in the current limit mode after 2 hours that is an indication that the battery is partially discharged and its capacity margins will be reduced. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive, and there is not adequate assurance that it can be recharged within [12] hours (Required Action A.2).

Required Action A.2 requires that the battery float current be verified as less than or equal to [2] amps. This indicates that, if the battery had been discharged as the result of the inoperable battery charger, it has now been fully recharged. If at the expiration of the initial [12] hour period the battery float current is not less than or equal to [2] amps this indicates there may be additional battery problems and the battery must be declared inoperable.

-----REVIEWER'S NOTE------

Any licensee wishing to adopt a Completion Time greater than 72 hours for Required Action A.3 will need to demonstrate that the Completion Time is appropriate for the plant in accordance with the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications." Otherwise, the 72 hour Completion Time must be adopted.

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Required Action A.3 limits the restoration time for the inoperable battery charger to [72] hours. This action is applicable if an alternate means of restoring battery terminal voltage to greater than or equal to the minimum established float voltage has been used (e.g., balance of plant non-Class 1E battery charger). The [72] hour Completion Time reflects a reasonable time to effect restoration of the qualified battery charger to OPERABLE status.

# BA.1, BA.2.1, BA.2.2, BA.2.3, and BA.2.4

If more than one DC distribution subsystem is required according to LCO 3.8.10, the DC subsystems remaining OPERABLE with one or more DC power sources inoperable may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS, fuel movement, and operations with a potential for draining the reactor vessel.

By allowing the option to declare required features inoperable with associated DC power source(s) inoperable, appropriate restrictions are implemented in accordance with the affected system LCOs' ACTIONS. In many instances this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and any activities that could result in inadvertent draining of the reactor vessel).

#### ACTIONS (continued)

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystems and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the plant safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the plant safety systems may be without sufficient power.

# SURVEILLANCE REQUIREMENTS

# SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.38. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

## **REFERENCES**

- 1. FSAR, Chapter [6].
- 2. FSAR, Chapter [15].

#### **B 3.8 ELECTRICAL POWER SYSTEMS**

#### B 3.8.6 Battery Cell-Parameters

#### **BASES**

#### **BACKGROUND**

This LCO delineates the limits on battery float current as well as electrolyte temperature, level, and float voltage, and specific gravity for the DC power source batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown." In addition to the limitations of this Specification, the [licensee controlled program] also implements a program specified in Specification 5.5.14 for monitoring various battery parameters.

The battery cells are of flooded lead acid construction with a nominal specific gravity of [1.215]. This specific gravity corresponds to an open circuit battery voltage of approximately 120 V for [58] cell battery (i.e., cell voltage of [2.065] volts per cell (Vpc)). The open circuit voltage is the voltage maintained when there is no charging or discharging. Once fully charged with its open circuit voltage ≥ [2.065] Vpc, the battery cell will maintain its capacity for [30] days without further charging per manufacturer's instructions. Optimal long term performance however, is obtained by maintaining a float voltage [2.20 to 2.25] Vpc. This provides adequate over-potential which limits the formation of lead sulfate and self discharge. The nominal float voltage of [2.22] Vpc corresponds to a total float voltage output of [128.8] V for a [58] cell battery as discussed in the FSAR, Chapter [8] (Ref. 2).

# APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in FSAR, Chapter [6] (Ref. 34) and Chapter [15] (Ref. 42), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power subsystems provide normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the unit. This includes maintaining at least one division subsystem of DC sources OPERABLE during accident conditions, in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst case single failure.

Since battery cell-parameters support the operation of the DC power sources, they satisfy Criterion 3 of the NRC Policy Statement.

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#### LCO

Battery cell-parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Battery parameter Electrolyte-limits are conservatively established, allowing continued DC electrical system function even with Category A and B-limits not met. Additional preventative maintenance, testing, and monitoring performed in accordance with the [licensee controlled program] is conducted as specified in Specification 5.5.14.

# **APPLICABILITY**

The battery cell-parameters are required solely for the support of the associated DC electrical power subsystem. Therefore, battery <u>parameter limits are electrolyte is only</u> required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.4 and LCO 3.8.5.

#### **ACTIONS**

#### A.1. A.2. and A.3

With one or more cells in one or more batteries in one subsystem < [2.07] V, the battery cell is degraded. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage (SR 3.8.4.1) and of the overall battery state of charge by monitoring the battery float charge current (SR 3.8.6.1). This assures that there is still sufficient battery capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of one or more cells in one or more batteries < [2.07] V, and continued operation is permitted for a limited period up to 24 hours.

Since the Required Actions only specify "perform," a failure of SR 3.8.4.1 or SR 3.8.6.1 acceptance criteria does not result in this Required Action not met. However, if one of the SRs is failed the appropriate Condition(s), depending on the cause of the failures, is entered. If SR 3.8.6.1 is failed then there is not assurance that there is still sufficient battery capacity to perform the intended function and the battery must be declared inoperable immediately.

#### B.1 and B.2

One or more batteries in one subsystem with float > [2] amps indicates that a partial discharge of the battery capacity has occurred. This may be due to a temporary loss of a battery charger or possibly due to one or more battery cells in a low voltage condition reflecting some loss of capacity. Within 2 hours verification of the required battery charger OPERABILITY is made by monitoring the battery terminal voltage. If the terminal voltage is found to be less than the minimum established float voltage there are two possibilities, the battery charger is inoperable or is operating in the current limit mode. Condition A addresses charger inoperability. If the charger is operating in the current limit mode after 2 hours that is an indication that the battery has been substantially discharged and likely cannot perform its required design functions. The time to return the battery to its fully charged condition in this case is a function of the battery charger capacity, the amount of loads on the associated DC system, the amount of the previous discharge, and the recharge characteristic of the battery. The charge time can be extensive. and there is not adequate assurance that it can be recharged within [12] hours (Required Action B.2). The battery must therefore be declared inoperable.

If the float voltage is found to be satisfactory but there are one or more battery cells with float voltage less than [2.07] V, the associated "OR" statement in Condition F is applicable and the battery must be declared inoperable immediately. If float voltage is satisfactory and there are no cells less than [2.07] V there is good assurance that, within [12] hours, the battery will be restored to its fully charged condition (Required Action B.2)

from any discharge that might have occurred due to a temporary loss of the battery charger.

#### -----REVIEWER'S NOTE------

A plant that cannot meet the 12 hour Completion Time due to an inherent battery charging characteristic can propose an alternate time equal to 2 hours plus the time experienced to accomplish the exponential charging current portion of the battery charge profile following the service test (SR 3.8.4.3).

A discharged battery with float voltage (the charger setpoint) across its terminals indicates that the battery is on the exponential charging current portion (the second part) of its recharge cycle. The time to return a battery to its fully charged state under this condition is simply a function of the amount of the previous discharge and the recharge characteristic of the battery. Thus there is good assurance of fully recharging the battery within [12] hours, avoiding a premature shutdown with its own attendant risk.

If the condition is due to one or more cells in a low voltage condition but still greater than [2.07] V and float voltage is found to be satisfactory, this is not indication of a substantially discharged battery and [12] hours is a reasonable time prior to declaring the battery inoperable.

Since Required Action B.1 only specifies "perform," a failure of SR 3.8.4.1 acceptance criteria does not result in the Required Action not met. However, if SR 3.8.4.1 is failed, the appropriate Condition(s), depending on the cause of the failure, is entered.

#### C.1, C.2, and C.3

With one or more batteries in one subsystem with one or more cells electrolyte level above the top of the plates, but below the minimum established design limits, the battery still retains sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of electrolyte level not met. Within 31 days the minimum established design limits for electrolyte level must be re-established.

With electrolyte level below the top of the plates there is a potential for dryout and plate degradation. Required Actions C.1 and C.2 address this potential (as well as provisions in Specification 5.5.14, Battery Monitoring and Maintenance Program). They are modified by a Note that indicates they are only applicable if electrolyte level is below the top of the plates. Within 8 hours level is required to be restored to above the top of the plates. The Required Action C.2 requirement to verify that there is no leakage by visual inspection and the Specification 5.5.14.b item to initiate action to equalize and test in accordance with manufacturer's recommendation. They are performed following the restoration of the electrolyte level to above the top of the plates. Based on the results of

the manufacturer's recommended testing the batter[y][ies] may have to be declared inoperable and the affected cell[s] replaced.

# <u>D.1</u>

With one or more batteries in one subsystem with pilot cell temperature less than the minimum established design limits, 12 hours is allowed to restore the temperature to within limits. A low electrolyte temperature limits the current and power available. Since the battery is sized with margin, while battery capacity is degraded, sufficient capacity exists to perform the intended function and the affected battery is not required to be considered inoperable solely as a result of the pilot cell temperature not met.

# <u>E.1</u>

With one or more batteries in redundant subsystem's with battery parameters not within limits there is not sufficient assurance that battery capacity has not been affected to the degree that the batteries can still perform their required function, given that redundant batteries are involved. With redundant batteries involved this potential could result in a total loss of function on multiple systems that rely upon the batteries. The longer Completion Times specified for battery parameters on non-redundant batteries not within limits are therefore not appropriate, and the parameters must be restored to within limits on at least one subsystem within 2 hours.

#### A.1, A.2, and A.3

With parameters of one or more cells in one or more batteries not within limits (i.e., Category A limits not met, Category B limits not met, or Category A and B limits not met) but within the Category C limits specified in Table 3.8.6-1, the battery is degraded but there is still sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of Category A or B limits not met, and continued operation is permitted for a limited period.

The pilot cell electrolyte level and float voltage are required to be verified to meet Category C limits within 1 hour (Required Action A.1). This check provides a quick indication of the status of the remainder of the battery cells. One hour provides time to inspect the electrolyte level and to confirm the float voltage of the pilot cell. One hour is considered a reasonable amount of time to perform the required verification.

Verification that the Category C limits are met (Required Action A.2) provides assurance that, during the time needed to restore the parameters to the Category A and B limits, the battery is still capable of performing its intended function. A period of 24 hours is allowed to complete the initial verification because specific gravity measurements

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must be obtained for each connected cell. Taking into consideration both the time required to perform the required verification and the assurance that the battery cell parameters are not severely degraded, this time is considered reasonable. The verification is repeated at 7 day intervals until the parameters are restored to Category A and B limits. This periodic verification is consistent with the normal Frequency of pilot cell Surveillances.

Continued operation is only permitted for 31 days before battery cell parameters must be restored to within Category A and B limits. Taking into consideration that while battery capacity is degraded, sufficient capacity exists to perform the intended function and to allow time to fully restore the battery cell parameters to normal limits, this time is acceptable for operation prior to declaring the DC batteries inoperable.

# ACTIONS (continued)

# <u>F₿.1</u>

When any battery parameter is outside the <u>allowances of the Required</u> <u>Actions for Condition A, B, C, D, or ECategory C limit for any connected</u> <u>cell</u>, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding <u>battery DC electrical power</u> <u>subsystem</u> must be declared inoperable. Additionally, <u>discovering one or</u> more batteries in one subsystem with one or more battery cells float <u>voltage less than [2.07] V and float current greater than [2] amps</u> <u>indicates that the battery capacity may not be sufficient to perform the intended functions. The battery must therefore be declared inoperable immediately other potentially extreme conditions, such as not completing the Required Actions of Condition A within the required Completion Time or average electrolyte temperature of representative cells falling below 60°F, also are cause for immediately declaring the associated DC electrical power subsystem inoperable.</u>

# SURVEILLANCE REQUIREMENTS

#### SR 3.8.6.1

Verifying battery float current while on float charge is used to determine the state of charge of the battery. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery and maintain the battery in a charged state. The equipment used to monitor float current must have the necessary accuracy and capability to measure electrical currents in the expected range. The float current requirements are based on the float current indicative of a charged battery. The 7 day Frequency is consistent with IEEE-450 (Ref. 1).

This SR is modified by a Note that states the float current requirement is not required to be met when battery terminal voltage is less than the minimum established float voltage of SR 3.8.4.1. When this float voltage is not maintained the Required Actions of LCO 3.8.4 ACTION A are being taken, which provide the necessary and appropriate verifications of the battery condition. Furthermore, the float current limit of [2] amps is established based on the nominal float voltage value and is not directly applicable when this voltage is not maintained.

#### SR 3.8.6.2 and SR 3.8.6.5

Optimal long term battery performance is obtained by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer, which corresponds to [130.5] V at the battery terminals, or [2.25] Vpc. This provides adequate overpotential, which limits the formation of lead sulfate and self discharge, which could eventually render the battery inoperable. Float voltages in

this range or less, but greater than [2.07] Vpc, are addressed in Specification 5.5.14. SRs 3.8.6.2 and 3.8.6.5 require verification that the cell float voltages are equal to or greater than the short term absolute minimum voltage of [2.07] V. The Frequency for cell voltage verification every 31 days for pilot cell and 92 days for each connected cell is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.3

The limit specified for electrolyte level ensures that the plates suffer no physical damage and maintains adequate electron transfer capability. The minimum design electrolyte level is the minimum level indication mark on the battery cell jar. The Frequency is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.4

This Surveillance verifies that the pilot cell temperature is greater than or equal to the minimum established design limit (i.e., [40]°F). Pilot cell electrolyte temperature is maintained above this temperature to assure the battery can provided the required current and voltage to meet the design requirements. Temperatures lower than assumed in battery sizing calculations act to inhibit or reduce battery capacity. The Frequency is consistent with IEEE-450 (Ref. 1).

#### SR 3.8.6.6

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.6.6; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of SR 3.8.4.3.

A modified discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test.

It may consist of just two rates; for instance, the one minute rate for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelope the duty cycle of the service test. Since the ampere-hours removed by a one minute discharge represents a very small portion of the battery capacity,

the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test must remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 1) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements. Furthermore, the battery is sized to meet the assumed duty cycle loads when the battery design capacity reaches this [80]% limit.

The Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity ≥ 100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 1), when the battery capacity drops by more than 10% relative to its capacity on the previous performance test or when it is 10% below the manufacturer's rating. All these Frequencies are consistent with the recommendations in IEEE-450 (Ref. 1).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and challenge safety systems.

The SR verifies that Category A battery cell parameters are consistent with IEEE-450 (Ref. 3), which recommends regular battery inspections (at least one per month) including voltage, specific gravity, and electrolyte temperature of pilot cells.

#### SR 3.8.6.2

The quarterly inspection of specific gravity and voltage is consistent with IEEE-450 (Ref. 3). In addition, within 24 hours of a battery discharge < [110] V or a battery overcharge > [150] V, the battery must be demonstrated to meet Category B limits. Transients, such as motor starting transients, which may momentarily cause battery voltage to drop to ≤ [110] V, do not constitute a battery discharge provided the battery terminal voltage and float current return to pre-transient values. This inspection is also consistent with IEEE-450 (Ref. 3), which recommends special inspections following a severe discharge or overcharge, to ensure that no significant degradation of the battery occurs as a consequence of such discharge or overcharge.

# SR 3.8.6.3

This Surveillance verification that the average temperature of representative cells is  $\geq 60^{\circ}\text{F}$  is consistent with a recommendation of IEEE-450 (Ref. 3), which states that the temperature of electrolytes in representative cells should be determined on a quarterly basis.

Lower than normal temperatures act to inhibit or reduce battery capacity. This SR ensures that the operating temperatures remain within an acceptable operating range. This limit is based on manufacturer's recommendations.

# SURVEILLANCE REQUIREMENTS (continued)

## Table 3.8.6-1

This table delineates the limits on electrolyte level, float voltage, and specific gravity for three different categories. The meaning of each category is discussed below.

Category A defines the normal parameter limit for each designated pilot cell in each battery. The cells selected as pilot cells are those whose temperature, voltage, and electrolyte specific gravity approximate the state of charge of the entire battery.

The Category A limits specified for electrolyte level are based on manufacturer's recommendations and are consistent with the guidance in IEEE-450 (Ref. 3), with the extra ½ inch allowance above the high water level indication for operating margin to account for temperatures and charge effects. In addition to this allowance, footnote a to Table 3.8.6-1 permits the electrolyte level to be above the specified maximum level during equalizing charge, provided it is not overflowing. These limits ensure that the plates suffer no physical damage, and that adequate electron transfer capability is maintained in the event of transient conditions. IEEE-450 (Ref. 3) recommends that electrolyte level readings should be made only after the battery has been at float charge for at least 72 hours.

The Category A limit specified for float voltage is ≥ 2.13 V per cell. This value is based on the recommendation of IEEE-450 (Ref. 3), which states that prolonged operation of cells below 2.13 V can reduce the life expectancy of cells.

The Category A limit specified for specific gravity for each pilot cell is ≥ 1.195 (0.015 below the manufacturer's fully charged nominal specific gravity or a battery charging current that had stabilized at a low value). This value is characteristic of a charged cell with adequate capacity. According to IEEE-450 (Ref. 3), the specific gravity readings are based on a temperature of 77°F (25°C).

The specific gravity readings are corrected for actual electrolyte temperature and level. For each 3 F (1.67°C) above 77°F (25°C), 1 point (0.001) is added to the reading; 1 point is subtracted for each 3°F below 77°F. The specific gravity of the electrolyte in a cell increases with a loss of water due to electrolysis or evaporation. Level correction will be in accordance with manufacturer's recommendations.

# SURVEILLANCE REQUIREMENTS (continued)

Category B defines the normal parameter limits for each connected cell.

The term "connected cell" excludes any battery cell that may be jumpered out.

The Category B limits specified for electrolyte level and float voltage are the same as those specified for Category A and have been discussed above. The Category B limit specified for specific gravity for each connected cell is ≥ 1.190 (0.020 below the manufacturer's fully charged, nominal specific gravity) with the average of all connected cells > 1.200 (0.010 below the manufacturer's fully charged, nominal specific gravity). These values are based on manufacturer's recommendations. The minimum specific gravity value required for each cell ensures that the effects of a highly charged or newly installed cell do not mask overall degradation of the battery.

Category C defines the limit for each connected cell. These values, although reduced, provide assurance that sufficient capacity exists to perform the intended function and maintain a margin of safety. When any battery parameter is outside the Category C limit, the assurance of sufficient capacity described above no longer exists, and the battery must be declared inoperable.

The Category C limit specified for electrolyte level (above the top of the plates and not overflowing) ensures that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C Allowable Value for float voltage is based on IEEE-450 (Ref. 3), which states that a cell voltage of 2.07 V or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limit of average specific gravity (≥ [1.190]), is based on manufacturer's recommendations (0.020 below the manufacturer's recommended fully charged, nominal specific gravity). In addition to that limit, it is required that the specific gravity for each connected cell must be no less than 0.020 below the average of all connected cells. This limit ensures that the effect of a highly charged or new cell does not mask overall degradation of the battery.

The footnotes to Table 3.8.6-1 that apply to specific gravity are applicable to Category A, B, and C specific gravity. Footnote (b) in Table 3.8.6-1 requires the above mentioned correction for electrolyte level and temperature, with the exception that level correction is not required when battery charging current is < 2 amps on float charge. This current provides, in general, an indication of overall battery condition.

# SURVEILLANCE REQUIREMENTS (continued)

Because of specific gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger current is an acceptable alternative to specific gravity measurement for determining the state of charge. This phenomenon is discussed in IEEE-450 (Ref. 3). Footnote (c) to Table 3.8.6-1 allows the float charge current to be used as an alternate to specific gravity for up to 7 days following a battery recharge. Within [7] days each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less than [7] days.

[Reviewer's Note: The value of [2] amps used in footnote (b) and (c) is the nominal value for float current established by the battery vendor as representing a fully charged battery with an allowance for overall battery condition.]

# 1. IEEE-450. 2. FSAR, Chapter [8]. 31. FSAR, Chapter [6]. 42. FSAR, Chapter [15]. 3. IEEE Standard 450, 1987.

IEEE Standard 485, 1983.