

October 24, 2000

Mr. James Davis, Director
Operations Department
Nuclear Energy Institute
1776 I Street, N. W.
Suite 400
Washington, DC 20006-3708

SUBJECT: TSTF-360, RESPONSE TO 09/18/00 LETTER

Dear Mr. Davis:

We have reviewed your September 18, 2000 letter forwarding your response to our proposed modifications to TSTF-360 (requirements for DC sources). We find your proposed responses acceptable as stated with two exceptions. With regard to your response to NRC Comments #1, #2, and #7 we accept your proposal to bracket the referenced Completion Times but propose to add a discussion to the Bases for each of these Completion Times to clarify why the times are bracketed. A proposal for such a Bases addition is enclosed.

With regard to your response to NRC changes to the Bases insert for Battery Capacity, we accept your proposal to delete the bracketed station blackout discussions but propose a slight revision to your originally proposed Battery Capacity insert as described in the enclosure.

We have discussed these proposed changes with members of the Technical Specification Task force and believe they are acceptable to all parties. We look forward to receiving your formal revision to the TSTF-360 package in the near future to allow us to include these changes in Revision 2 of the Standard Technical Specification NUREGs. Please contact Nanette Gilles of my staff at (301) 415-1180 or e-mail "nvg@nrc.gov" if you have any questions or need further information.

Sincerely,

/RA/

William D. Beckner, Chief
Technical Specifications Branch
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation

Enclosure: As stated

cc: See attached list

J. Davis

October 24, 2000

cc:

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J. Davis

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Response to NEI Comments (9/18/00) on NRC Revised Version of TSTF-360

NEI Comment on NRC Comment #1

We accept bracketing of the 12 hour Completion Time for Required Action A.2 in TS 3.8.4, Required Action A.2 in TS 3.8.5, and Required Action B.2 in TS 3.8.6. Following is the instruction for determining a plant-specific Completion Time. This should be included in the Bases as shown on the attached markup.

New Insert: [12] Hour Completion Time

(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)).

NEI Comment on NRC Bases Insert: Battery Capacity

The changes the staff made to the TSTF-360 Bases relative to station blackout (SBO) were directed at plants that use their safety related batteries to help manage an SBO event. Other plants have met the SBO criteria without relying on the safety-related batteries (e.g., plants utilizing a non-1E battery to support an alternate ac source). Some plants opted to use the SBO duty cycle for the battery service test required in the TS. Because of this diversity with regard to what the TS battery service test requirements encompassed, the staff believed some clarity was needed on that particular topic. After further discussion, we believe that the following revision to the Battery Capacity insert may provide the needed clarification without going into great detail.

New Insert: Battery Capacity

“... 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.”