Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

Dominion

OCT 21 2002

Docket No. 50-336
B18762

RE: 10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Power Station, Unit No. 2
Response to a Request for Additional Information
License Basis Document Change Request 2-13-02
Electrical Power Systems - D.C. Distribution

In a teleconference on September 20, 2002, the Nuclear Regulatory Commission (NRC) requested additional information with respect to a Dominion Nuclear Connecticut, Inc. (DNC) August 12, 2002 license amendment request.[1] The August 12, 2002 license amendment request proposed changes to the Millstone Unit No. 2 Technical Specifications which relate to the facility's direct current distribution systems.

The NRC had one (1) question for this license amendment request which related to Technical Specification Surveillance Requirement 4.8.2.3.2.e. Technical Specification Surveillance Requirement 4.8.2.3.2.e requires that at least once per 60 months, during shutdown, battery capacity is verified to be within 80% of the manufacturer's rating when subjected to a performance discharge test. This performance discharge test can be performed in lieu of the 18 month battery service test required by Technical Specification Surveillance Requirement 4.8.2.3.2.d. The NRC questioned whether use of the performance discharge test in lieu of the service test adequately verifies battery operability, specifically, whether or not sufficient amperage is specified such that the performance discharge test adequately encompasses the service test loads.

---

[1] J. Alan Price to U.S. NRC, "Millstone Nuclear Power Station, Unit No. 2, License Basis Document Change Request (LBDCR) 2-13-02, Electrical Power Systems - D.C. Distribution," dated August 12, 2002.

A001

The Millstone Unit No. 2 D.C. batteries for which Technical Specification Surveillance Requirement 4.8.2.3.2 apply are maintained in accordance with ANSI/IEEE 450-1980.[2] Section 6.6 of ANSI/IEEE 450-1980 specifies that a battery service test verifies the ability to satisfy design requirements (battery duty cycle) of the direct current (D.C.) system. This criteria is met by performing the service test such that the discharge rate and test length correspond as closely as practical to the design requirements (battery duty cycle) of the affected D.C. system. Section 6.3 of ANSI/IEEE 450-1980 specifies that the discharge rate for the performance discharge test should be a constant current load equal to the manufacturer's rating of the battery for the selected test length.

The battery service tests and performance discharge test performed to satisfy Millstone Unit No. 2 D.C. Technical Specification Surveillance Requirements 4.8.2.3.2.d and 4.8.2.3.2.e are consistent with the guidance provided in ANSI/IEEE 450-1980, as discussed herein. While the first minute of the battery service test is performed at a slightly higher current than the continuous current used for the performance discharge test, the total ampere-hours discharged during the performance discharge test is significantly (approximately 40%) more than the total ampere-hours discharged during a battery service test, thereby verifying operability of the affected D.C. batteries.

There are no regulatory commitments contained within this letter.

If you should have any questions on the above, please contact Mr. Ravi Joshi at (860) 440-2080.

---

[2] ANSI/IEEE 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generation Stations and Substations," dated October 24, 1980.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.

J. Alan Price
Site Vice President - Millstone

Sworn to and subscribed before me

this 21 day of October, 2002

Diane M Phillipo
Notary Public

My Commission expires _____

DIANE M. PHILLIPO
NOTARY PUBLIC
MY COMMISSION EXPIRES 12/31/2005

cc: H. J. Miller, Region I Administrator
R. B. Ennis, NRC Senior Project Manager, Millstone Unit No. 2
NRC Senior Resident Inspector, Millstone Unit No. 2

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127