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RBG-46171

October 21, 2003

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

SUBJECT: License Amendment Request  
River Bend Station, Unit 1 (RBS)  
Docket No. 50-458  
License No. NPF-47  
Removal of MODE Restrictions for Surveillance Testing of the Division III  
Battery

Dear Sir or Madam:

Pursuant to 10CFR50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment for River Bend Station, Unit 1 (RBS). The proposed change will remove the MODE restrictions for performance of Surveillance Requirements (SR) 3.8.4.7 and 3.8.4.8 for the Division III DC electrical power subsystem. The batteries tested by these surveillances are part of the DC power source of control and motive power as required for the High Pressure Core Spray (HPCS) system logic, HPCS diesel-generator set control and protection, and all Division III related controls. These surveillances verify that the battery capacity is adequate to perform their required functions. The purpose of the proposed changes is to allow performance of the surveillances during normal plant operation in conjunction with a HPCS system outage rather than only during refueling outages. This will help to reduce the complexity of work and testing activities during refueling outages.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that this change involves no significant hazards considerations. The bases for these determinations are included in the attached submittal.

The proposed change contains two new commitments as summarized in Attachment 4. Entergy has submitted a similar license amendment request for the Grand Gulf Nuclear Station which is still pending (TAC No. MB8938).

Entergy requests approval of the proposed amendment by August 15, 2004. The requested approval date and implementation period will enable RBS to optimize refueling outage planning and activities. Once approved, the amendment shall be implemented within 60 days. Although this request is neither exigent nor emergency, your prompt review is requested.

A001

If you have any questions or require additional information, please contact Ron Byrd at 601-368-5792.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 21, 2003.

Sincerely,



Paul D. Hinnenkamp  
Vice President, Operations  
River Bend Station

PDH/rwb

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. Changes to TS Bases pages – for information only
4. List of Regulatory Commitments

cc: U. S. Nuclear Regulatory Commission  
Region IV  
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Arlington, TX 76011

NRC Senior Resident Inspector  
P. O. Box 1050  
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U.S. Nuclear Regulatory Commission  
Attn: Mr. Michael K. Webb MS O-7D1  
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Mr. Prosanta Chowdhury  
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P. O. Box 82215  
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**Attachment 1**

**RBG- 46171**

**Analysis of Proposed Technical Specification Change**

## 1.0 DESCRIPTION

This letter is a request to amend Operating License NPF-47 for River Bend Station, Unit 1 (RBS).

Entergy requests changes to Section 3.8.4, "DC Sources – Operating" of the Technical Specification (TS), Appendix A of the Operating License. Specifically, the proposed change will remove the MODE restrictions for performance of Surveillance Requirements (SR) 3.8.4.7 and 3.8.4.8 for the Division III DC electrical power subsystem. The batteries tested by these surveillances are part of the DC power source of control and motive power as required for the High Pressure Core Spray (HPCS) system logic, HPCS diesel-generator set control and protection, and all Division III related controls. These surveillances verify that the battery capacity is adequate to perform their required functions. The purpose of the proposed changes is to allow performance of the surveillances during MODE 1, 2, or 3 in conjunction with a HPCS system outage such that the testing will no longer have to be performed only during plant outages. This will help to reduce the complexity of work and testing activities during refueling outages.

The next RBS refueling outage is scheduled for the Fall of 2004. Entergy desires that this amendment be issued by August 15, 2004 to support work planning prior to the outage.

## 2.0 PROPOSED CHANGE

TS Limiting Condition for Operation (LCO) 3.8.4 "DC Sources – Operating" governs the DC electrical power subsystem requirements for all three divisions of Engineered Safety Feature (ESF) systems. The DC electrical power sources are required to be operable in plant MODES 1 (Power Operation), 2 (Startup), and 3 (Hot Shutdown). Currently certain TS 3.8.4 Surveillance Requirements (SRs) contain notes which prohibit performance during MODES 1, 2 or 3. The proposed changes will modify the notes associated with these SRs for Division III.

Specifically, Entergy proposes to modify Note 2 for SR 3.8.4.7 and the note for SR 3.8.4.8, that currently read "This Surveillance shall not be performed in MODE 1, 2, or 3. However, credit may be taken for unplanned events that satisfy this SR." The Note for each of these SRs will be revised to state "This Surveillance shall not be performed in MODE 1, 2, or 3 (not applicable to Division III). However, credit may be taken for unplanned events that satisfy this SR."

In summary, Entergy is proposing to remove the MODE restrictions for performing SR 3.8.4.7 and SR 3.8.4.8 for the Division III DC electrical power subsystem batteries to allow SR performance during plant operation.

Changes to the TS Bases associated with the proposed changes to SR 3.8.4.7 and SR 3.8.4.8 are provided in Attachment 3 for your information and will be implemented in accordance with the TS 5.5.11, Technical Specification Bases Control Program.

## 3.0 BACKGROUND

River Bend Station Technical Specification 3.8.4 "DC Sources – Operating" specifies the requirements for the Engineered Safety Feature (ESF) DC electrical power subsystems. The

DC electrical power subsystems 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 Design Basis Accident (DBA). The DC power system provides the AC emergency power system with control power and both motive and control power to selected safety related equipment. The 125 VDC electrical power system consists of three independent Class 1E DC electrical power subsystems, Divisions I, II, and III. Each subsystem consists of a battery, associated battery charger(s), and all the associated control equipment and interconnecting cabling. As required by 10 CFR 50, Appendix A, General Design Criteria (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.

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 ESF batteries. 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 the redundant Class 1E subsystems such as batteries, battery chargers, or distribution panels.

The function of the Division III 125 VDC power system is to provide a reliable, continuous, and independent 125 VDC power source of control and motive power as required for the HPCS system logic, HPCS diesel-generator set control and protection, and all Division III related controls. A battery charger is provided for the battery. The Division III 125 VDC system is classified as Class 1E. The Division III 125 VDC system is independent of all other divisional batteries and there is no manual or automatic connection to any other battery.

The Division III DC power source is required for HPCS diesel generator field flashing, control logic, and control and switching function of 4.16 kV breakers. Updated Safety Analysis Report (USAR) Table 8.3-6 lists the Division III peak amperage requirements per time interval after AC power loss during accident conditions. The Division III battery has adequate storage to carry the required load continuously for at least 2 hours. The battery charger of Division III DC electrical power subsystem has sufficient 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.

The ESF divisional batteries are required by TS SR 3.8.4.7 and 3.8.4.8 to be service tested and performance discharge tested periodically. The battery service test verifies the battery's capability to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length (2 hours for Division III) correspond to the design duty cycle requirements. The battery performance test is a test of constant current capacity of the battery to detect any change in the capacity. The performance discharge test is intended to determine overall battery degradation due to age and usage.

The required surveillance frequency for the battery service test is every 18 months. The frequency for the performance discharge test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life, the surveillance frequency for the performance discharge test is reduced to 18 months.

The TS Bases currently state that "degradation" is indicated when the battery capacity drops by more than 10% of rated capacity from its average on previous performance tests or is below 90% of the manufacturer's rating. As discussed in sections 5.1 and 6.0 of this Attachment, the definition of "degradation" is being changed to be consistent with the 1995 edition of IEEE Standard 450, "IEEE Recommended Practice for Maintenance, Testing and Replacement of Large Lead Storage Batteries for Generating Stations and Substations." and NUREG 1434, *Standard Technical Specifications General Electric Plants, BWR/6*. The revised Bases will require RBS to determine whether battery degradation has occurred by comparing performance test results with the previous performance test rather than the average of previous performance tests.

RBS will implement the Bases change in accordance with TS 5.5.11 within 60 days following issuance of this requested amendment.

#### 4.0 TECHNICAL ANALYSIS

The TS Bases, as currently written, state that the reason for the MODE restriction note for SRs 3.8.4.7 and 3.8.4.8 is to preclude the potential for perturbations of the electrical distribution system during plant operation. However, the noted concern is unwarranted with respect to Division III. By virtue of the HPCS being a stand-alone system with its dedicated DG and independent distribution system, there is minimal opportunity for the performance of these SRs to have any impact on other safety related plant equipment. The Division III DC system is independent of all other divisional batteries and there is no manual or automatic connection to any other battery. The Division III batteries are disconnected from the battery chargers during the test and have no connection with any other equipment that is required to be operable. Therefore, performance of the required testing during plant operation would not result in a challenge to any other plant safety system.

Currently, the Division III HPCS DG and HPCS system are removed from service to perform scheduled maintenance while in MODE 1, 2, or 3 as allowed by the TS. The TS change is desired to allow the Division III battery tests to be performed in conjunction with these scheduled system outages. The change will allow the Division III battery service test required by SR 3.8.4.7 and the Division III battery performance discharge test required by SR 3.8.4.8 to be performed in MODES 1, 2, or 3 in conjunction with a HPCS system outage or for unplanned events. The TS allow up to 14 days of inoperability if the Reactor Core Isolation Cooling system is operable. This provides ample time for the performance of the battery SRs. The time needed to perform the battery testing is approximately 36 hours.

The required SRs make the Division III batteries unavailable for supporting the HPCS system during portions of the tests. However, as noted above, the batteries are expected to be unavailable for approximately 36 hours. This testing period is within the period of time that the system will already be out of service for other planned maintenance. Therefore, the battery test does not increase unavailability of the supported system or represent any change in risk above the current practice of planned system maintenance outages as currently allowed by the TS.

Regarding risk management, the testing of the Division III batteries will be enveloped by the risk management of the system outage. Risk management of the system outage is addressed in

several ways. First, in addition to TS LCO limitations, the Safety Function Determination Program (SFDP) of TS 5.5.10 is required to protect against a loss of safety function. Secondly, the RBS approach to performing maintenance also uses a protected division concept. This means that without special considerations work is performed on only one division at a time.

RBS has a Configuration Risk Management Program (CRMP) in place in accordance with RBS commitments for compliance with 10 CFR 50.65, "Monitoring the Effectiveness of Maintenance". The program provides assurance that risk-significant plant equipment configurations are precluded or minimized when plant equipment is removed from service. Additionally, the HPCS system reliability and availability are monitored and evaluated in relationship to Maintenance Rule goals to ensure that total outage times do not degrade operational safety over time.

## 5.0 REGULATORY ANALYSIS

### 5.1 Applicable Regulatory Requirements/Criteria

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met.

Entergy has determined that the proposed changes do not require any exemptions or relief from regulatory requirements, other than the TS, and do not affect conformance with any GDC differently than described in the USAR. As required by 10 CFR 50, Appendix A, General Design Criteria (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 proposed changes do not affect the design or function of the DC system.

USAR Table 1.8-1 discusses compliance with Regulatory Guide 1.129, "Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," February, 1978 edition. This edition of the Regulatory Guide states that the battery service test should be done during refueling operations or at some other outage. This amendment will allow the battery test for the Division III battery to be performed on-line.

Regulatory Guide 1.129 also endorses IEEE Standard 450-1975, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications." The 1975 edition of the IEEE standard defined battery "degradation" in relation to a change in capacity from the average of previous performance tests. However, newer editions of the standard define degradation in relation to the change in capacity from only the previous performance test. As discussed earlier, the TS Bases will be revised to define "degradation" consistent with the newer edition of the IEEE standard and NUREG 1434.

The proposed TS changes deviate from the Standard TS for BWR6s, NUREG 1434. This deviation is acceptable because the RBS Division III system is designed as a stand-alone ECCS system with its dedicated DG and independent distribution system. Therefore, there is minimal opportunity for the performance of these SRs to have any impact on plant operation or on other safety related plant equipment.

## 5.2 No Significant Hazards Consideration

The Entergy request is to change Section 3.8.4, "DC Sources – Operating" of the Technical Specification (TS), Appendix A of the Operating License. Specifically, the proposed change will remove the MODE restrictions for performance of Surveillance Requirements (SR) 3.8.4.7 and 3.8.4.8 for the Division III DC electrical power subsystem. The battery tested by these surveillances is part of the direct current (DC) power source of control and motive power as required for the High Pressure Core Spray (HPCS) system logic, HPCS diesel-generator set control and protection, and all Division III related controls. These surveillances verify the battery capacity is adequate to perform the required functions. The purpose of the proposed changes is to allow performance of the surveillances during MODES 1, 2, or 3 such that the testing will no longer have to be performed only during plant outages. Entergy Operations, Inc. has evaluated whether or not a significant hazards consideration is involved with the proposed amendment 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 power supplied by the battery is used as a source of control and motive power for the HPCS system logic, HPCS diesel-generator set control and protection, and other Division III related controls. The loads supplied by this system are loads associated with Division III of the Emergency Core Cooling Systems (ECCS).

The battery testing period is within the period of time that the system will already be out of service for other planned maintenance. The battery test does not increase unavailability of the supported system or represent any change in risk above the current practice of planned system maintenance outages as currently allowed by the TS. Any risk associated with the testing of the Division III batteries will be enveloped by the risk management of the system outage.

The out of service condition is controlled and evaluated for safety implications in accordance with 10 CFR 50.65. The HPCS system reliability and availability are monitored and evaluated in relationship to Maintenance Rule goals to ensure that total outage times do not degrade operational safety over time.

Therefore, the proposed change will have no effect on the probability or consequences of any previously evaluated accident.

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

Response: No.

This request involves the testing of the HPCS battery on-line while the system is already out of service. The testing will not add additional out of service time. Testing during this period has no influence on, nor does it contribute in any way to, the possibility of a new or different kind of accident or malfunction from those previously analyzed. The method of

performing the test is not changed. No new accident modes are created by testing during the period when the system is already unavailable. Because the system is already out of service, no safety-related equipment or safety functions are altered as a result of this change.

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 battery testing will be performed when the HPCS system is already out of service for maintenance. The out of service condition is controlled and evaluated for safety implications in accordance with 10 CFR 50.65. The batteries are not expected to be unavailable for more than 36 hours. This testing period is within the period of time that the system will already be out of service for other planned maintenance. Therefore, the battery test does not increase unavailability of the supported system or represent any change in risk above the current practice of planned system maintenance outages as currently allowed by the TS. Timing of this test has no effect on any fission product barrier.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Entergy concludes that the proposed amendment(s) present 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.

### 5.3 Environmental Considerations

The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment 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 amendment.

### 6.0 PRECEDENCE

Entergy has submitted a similar license amendment request for the Grand Gulf Nuclear Station (GGNS) which is still pending (Reference 7.1). During NRC staff review of this amendment, Entergy and members of your staff held a call concerning the TS Bases definition of "degradation" for SR 3.8.4.8. The current TS Bases defines "degradation" as when battery capacity drops by more than 10% of rated capacity from the average of previous tests or is below 90% of the manufacturer's rating. After some discussion, Entergy agreed to revise the TS

Bases for SR 3.8.4.8 and supplemented the GGNS request with a letter dated August 7, 2003 (Reference 7.2).

Entergy is committing in this letter to make the same Bases change under the provisions of TS 5.5.11, "Technical Specifications (TS) Bases Control Program."

## 7.0 REFERENCES

- 7.1 Letter GNRO-2003/00033 from J. C. Roberts of Entergy to USNRC, "License Amendment Request, Removal of MODE Restrictions for Surveillance Testing of the Division 3 Battery," dated May 12, 2003, ADAMS Accession No. ML031420552.
- 7.2 Letter GNRO-2003/00044 from J. C. Roberts of Entergy to USNRC, "Supplement to License Amendment Request, Removal of MODE Restrictions for Surveillance Testing of the Division 3 Battery (TAC No. MB8938)," dated August 7, 2003, ADAMS Accession No. ML032310412.

**Attachment 2**

**RBG-46171**

**Proposed Technical Specification Changes (mark-up)**



SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.4.8</p> <p>-----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.</p> <hr/> <p>Verify battery capacity is <math>\geq 80\%</math> of the manufacturer's rating when subjected to a performance discharge test.</p>	<p><i>(not applicable to Division III)</i></p> <p>60 months</p> <p><u>AND</u></p> <p>-----NOTE-----            Only applicable when battery shows degradation or has reached 85% of expected life.</p> <hr/> <p>18 months</p>

**Attachment 3**

**RBG-46171**

**Changes to Technical Specification Bases Pages**

**For Information Only**

BASES

SURVEILLANCE  
REQUIREMENTS

SR 3.8.4.6 (continued)

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. Momentary transients that are not attributable to charger performance do not invalidate this test.

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 3.8.4.7

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.

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.

*The Division III test may be performed in MODE 1, 2, or 3 in conjunction with HPCS system outages.*

This SR is modified by two Notes. Note 1 allows the once per 60 months performance of SR 3.8.4.8 in lieu of SR 3.8.4.7. This substitution is acceptable because the battery performance test (SR 3.8.4.8) represents a more severe test of battery capacity than the battery service test (SR 3.8.4.7). Because both the battery service test and the battery performance test involve battery capacity determination, complete battery replacement invalidates the previous performance of these surveillance requirements. In addition to requiring the re-performance of both of these surveillance tests prior to declaring the battery OPERABLE, complete battery replacement also resets the 60 month time period used for substitution of the service test by the performance test. For this reason, substitution is acceptable for performance testing conducted within the first two years of service of a new battery as required by Reference 8. 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. Examples of unplanned events may include:

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and

(continued)

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.4.7 (continued)

- 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.

SR 3.8.4.8

A battery performance 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.

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 the Surveillance Frequency is reduced to 18 months. Degradation is indicated, according to IEEE-450 (Ref. 8), when the battery capacity drops by more than 10% of rated capacity ~~from its average on previous tests~~, or when it is  $\geq 10\%$  below the manufacturer's rating. These Frequencies are based on the recommendations in IEEE-450 (Ref. 8).

relative to its capacity on the

performance

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. Examples of unplanned events may include:

(continued)

The Division III test may be performed in MODE 1, 2, or 3 in conjunction with HPCS system outages.

**BASES**

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**SURVEILLANCE  
REQUIREMENTS**

SR 3.8.4.8 (continued)

- 1) Unexpected operational events which cause the equipment to perform the function specified by this Surveillance, for which adequate documentation of the required performance is available; and
  - 2) Post corrective maintenance testing that requires performance of this Surveillance in order to restore the component to OPERABLE, provided the maintenance was required, or performed in conjunction with maintenance required to maintain OPERABILITY or reliability.
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**REFERENCES**

1. 10 CFR 50, Appendix A, GDC 17.
  2. Regulatory Guide 1.6, March 10, 1971.
  3. IEEE Standard 308, 1978.
  4. USAR, Section 8.3.2.
  5. USAR, Chapter 6.
  6. USAR, Chapter 15.
  7. Regulatory Guide 1.93, December 1974.
  8. IEEE Standard 450, ~~1978~~ 1995.
  9. Regulatory Guide 1.32, February 1977.
  10. Regulatory Guide 1.129, December 1974.
  11. IEEE Standard 485.
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**Attachment 4**

**RBG-46171**

**List of Regulatory Commitments**

**List of Regulatory Commitments**

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
RBS will implement the Bases change in accordance with TS 5.5.11 within 60 days following issuance of this requested amendment. The revised Bases will require RBS to determine whether battery degradation has occurred by comparing test results with the previous performance test rather than the average of previous performance tests.	X		Within 60 days of amendment issuance
The Division III battery service test required by SR 3.8.4.7 and the Division III battery performance discharge test required by SR 3.8.4.8 may be performed in MODES 1, 2, or 3 in conjunction with a HPCS system outage or for unplanned events.		X	Within 60 days of amendment issuance