



# DRAFT REGULATORY GUIDE

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## DRAFT REGULATORY GUIDE DG-1183

(New Regulatory Guide)

### -sizing OF LARGE LEAD-ACID STORAGE BATTERIES

#### A. INTRODUCTION

This guide describes a method that the staff of the U.S. Nuclear Regulatory Commission (NRC) considers acceptable for use in complying with requirements and regulations on the criteria for the sizing of large lead-acid storage batteries for use in nuclear power plants. Specifically, the method described in this regulatory guide relates to requirements set forth in Title 10, Section 50.55a, "Codes and Standards," of the *Code of Federal Regulations* (10 CFR 50.55a) (Ref. 1) (as amended by the Federal Register notice of April 13, 1999) and General Design Criteria (GDC) 1 and 17, as set forth in Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities":

- 10 CFR 50.55a(a)(1) requires that structures, systems, and components be designed, fabricated, erected, constructed, tested, and inspected to quality standards commensurate with the importance of the safety function to be performed.
- GDC 1, "Quality Standards and Records," requires that structures, systems, and components important to safety shall be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions to be performed.
- GDC 17, "Electric Power Systems," requires that an onsite electric power system and an offsite

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This regulatory guide is being issued in draft form to involve the public in the early stages of the development of a regulatory position in this area. It has not received final staff review or approval and does not represent an official NRC final staff position.

Public comments are being solicited on this draft guide (including any implementation schedule) and its associated regulatory analysis or value/impact statement. Comments should be accompanied by appropriate supporting data. Written comments may be submitted to the Rulemaking, Directives, and Editing Branch, Office of Administration, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; emailed to [NRCREP@nrc.gov](mailto:NRCREP@nrc.gov); submitted through the NRC's interactive rulemaking Web page at <http://www.nrc.gov>; faxed to (301) 415-5144; or hand-delivered to Rulemaking, Directives, and Editing Branch, Office of Administration, US NRC, 11555 Rockville Pike, Rockville, Maryland 20852. Between 7:30 a.m. and 4:15 p.m. on Federal workdays. Copies of comments received may be examined at the NRC's Public Document Room, 11555 Rockville Pike, Rockville, MD. Comments will be most helpful if received by September 5, 2008

Electronic copies of this draft regulatory guide are available through the NRC's interactive rulemaking Web page (see above); the NRC's public Web site under Draft Regulatory Guides in the Regulatory Guides document collection of the NRC's Electronic Reading Room at <http://www.nrc.gov/reading-rm/doc-collections/>; and the NRC's Agencywide Documents Access and Management System (ADAMS) at <http://www.nrc.gov/reading-rm/adams.html>, under Accession No. ML080650493.

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electric power system shall be provided to permit functioning of structures, systems, and components important to safety.

In addition, 10 CFR 50.63(a)(2) requires that the reactor core and associated coolant, control, and protection systems, including station batteries and any other necessary support systems, must provide sufficient capacity and capability to assure that the core is cooled and appropriate containment integrity is maintained in the event of a station blackout for the specified duration. The capability for coping with a station blackout of specified duration shall be determined by an appropriate coping analysis. Licensees are expected to have the baseline assumptions, analyses, and related information used in their coping evaluations available for NRC review.

This regulatory guide endorses (with certain clarifying regulatory positions described in Section C of this guide) IEEE Std 485-1997, "IEEE Recommended Practice for Sizing of Lead-Acid Batteries for Stationary Applications." (Ref. 2)

The NRC issues regulatory guides to describe to the public methods that the staff considers acceptable for use in implementing specific parts of the agency's regulations, to explain techniques that the staff uses in evaluating specific problems or postulated accidents, and to provide guidance to applicants. Regulatory guides are not substitutes for regulations and compliance with them is not required.

This regulatory guide contains information collection requirements covered by 10 CFR Part 50 that the Office of Management and Budget (OMB) approved under OMB control number 3150-0011. The NRC may neither conduct nor sponsor, and a person is not required to respond to, an information collection request or requirement unless the requesting document displays a currently valid OMB control number.

## **B. DISCUSSION**

As amended by the Federal Register notice, 64 FR 17944, dated April 13, 1999, 10 CFR 50.55a(h)(2) and (3) require compliance with the requirements for safety systems in IEEE Std 603-1991, "IEEE Standard Criteria for Safety Systems for Nuclear Power Generating Stations" (Ref. 3) and the correction sheet dated January 30, 1995. The IEEE Std 603-1991 states that specific criteria unique to the Class 1E power systems are given in IEEE Std 308-1980, "IEEE Standard Criteria for Class 1E Power Systems for Nuclear Power Generating Stations," (Ref. 4). Furthermore, the IEEE Std 308-1980 states that "each battery supply shall be capable of starting and operating its required steady-state and transient loads" and refers the reader to "IEEE Std 485-1978 for recommendations on sizing batteries." The IEEE Std 485-1978 is no longer available from the IEEE. However, wording of this section of the IEEE Std 308-2001, "IEEE Standard Criteria for Class 1E Power Systems for Nuclear Power Generating Stations," (Ref. 5) is identical to that of the IEEE Std 308-1980 except that it references the IEEE Std 485-1997.

While the NRC has not previously endorsed the IEEE Std 485, several previous positions relate directly or indirectly to various versions of this standard. In addition to the references above to the IEEE Std 485-1978, the NRC staff has previously endorsed designs predicated on both the IEEE Std 485-1983 and the IEEE Std 485-1997. For example, NUREG-1431, "Standard Technical Specifications Westinghouse Plants" (Ref. 6); NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4" (Ref. 7); and NUREG-1434, "Standard Technical Specifications General Electric Plants, BWR/6," (Ref. 8) all reference the IEEE Std 485-1998. On the other hand, NUREG-1793, "Final Safety Evaluation Report Related to Certification of the AP1000 Standard Design," (Ref. 9) issued in September 2004, states that among the "features of the AP1000, compared to currently operating

reactors...[is]...increased battery capacity.” While NUREG-1793 notes that a regulatory guide had not previously endorsed the IEEE Std 485-1997, it proceeds to state that the battery sizing, which was performed in accordance with the IEEE Std 485-1997, is considered acceptable. Additionally, Appendix A to NUREG/CR-6901, “Current State of Reliability Modeling Methodologies for Digital Systems and Their Acceptance Criteria for Nuclear Power Plant Assessments,” (Ref. 10) issued in February 2006, references the IEEE Std 485-1997. More recently, Revision 3 to Section 8.3.2 of NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants,” (Ref. 11) issued in March 2007, states that “IEEE Std 485 provides a method acceptable to the staff for sizing stationary lead-acid batteries” and cites the IEEE Std 485-1997 as a reference.

The Battery Sizing Working Group of Standards Coordinating Committee 29 prepared the IEEE Std 485-1997, and the IEEE Standards Board approved it on March 20, 1997. The IEEE reviewed and affirmed the standard in 2003. The IEEE Std 485-1997 describes recommended methods for defining the direct current (dc) load and for sizing a lead-acid battery to supply that load. The IEEE Std 485-1997 is applicable to full-float stationary applications in which a battery charger normally maintains the battery in a fully charged state and provides power to the dc load. This standard is applicable to vented and valve-regulated lead-acid batteries, and also describes some factors relating to cell selection. However, consideration of battery types other than lead-acid is beyond the scope of the standard. Additionally, installation, maintenance, qualification, testing procedures, and design of the dc system and sizing of the battery charger(s) are also beyond the scope of this standard.

The IEEE Std 485-1978 is no longer available from the IEEE as well as a comparison with the current standard. The IEEE Std 485-1983, “IEEE Recommended Practice for Sizing Large Lead Storage Batteries for Generating Stations and Substations” (Ref. 12), addresses sizing of large lead storage batteries for generating stations and substations but does not mention valve-regulated lead-acid batteries. Subsequently, the IEEE Std 485-1997 was generalized for the sizing of lead-acid batteries for stationary applications. The later version explicitly states its applicability to both vented and valve-regulated lead-acid batteries. In addition, requirements (indicated by the verb “shall”) in the previous version of the standard have been restated as recommendations (indicated by the verb “should”) in IEEE Std 485-1997. A comparison of IEEE Std 485-1983 and IEEE Std 485-1997 is available from the IEEE. The IEEE Std 485-1997 also includes an additional instruction to consult with manufacturers on any limitations on paralleling two or more strings of cells. The 1997 edition updates a previous reference to the IEEE Std 484-1981 in IEEE Std 485-1983 to reference the IEEE Std 484-1996, “Recommended Practice for Installation Design and Installation of Vented Lead-Acid Batteries for Stationary Applications.” The 1981 edition of IEEE Std 484 is no longer in print, and the IEEE has since published a newer version of the standard, IEEE Std 484-2002 (Ref 13) which the NRC endorsed in Revision 2 to Regulatory Guide 1.128, “Installation Design and Installation of Vented Lead-Acid Storage Batteries for Nuclear Power Plants” (Ref. 14), issued in February 2007.

The IEEE Std 450-2002, “IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications” (Ref. 15), which the NRC endorsed in Regulatory Guide 1.129, “Maintenance, Testing, and Replacement of Vented Lead-Acid Storage Batteries for Nuclear Power Plants,” (Ref. 16) repeatedly refers to IEEE Std 485-1997 in its discussion of considerations related to battery sizing as it affects many of the various testing criteria, including acceptance tests, performance tests, service tests, and battery replacement criteria.

The sizing methodology provided by IEEE Std 485-1997 is essentially identical to that provided by IEEE Std 485-1983. The approach consists of first defining the load that the batteries will be required to support. To this end, the standard provides guidance on general considerations that should be included in defining the duty cycle; load classifications, including continuous, non-continuous, and momentary loads; and the construction of a duty-cycle diagram. Annex B to IEEE Std 485-1997 provides a method

for converting constant power and constant resistance loads to constant current loads so that they can be correctly considered using the sizing methodology provided in the standard. The standard provides a brief summary of some factors that should be considered when selecting a cell design for a particular application. The IEEE Std 485-1997 refers the user to vendor literature and to the IEEE Std 1184-1994, "IEEE Guide for Batteries for Uninterruptible Power Supply Systems," (Ref. 17) in its discussion of cell selection considerations.

The standard provides a methodical and conservative procedure for determining the battery size required to deliver sufficient power to the previously determined load. In addition to the defined duty cycle, the approach considers other factors, including maximum system voltage, minimum system voltage, and various correction factors. The IEEE Std 485-1997 no longer includes a discussion on charging rate as a limiting factor in battery sizing and a qualification on total time span of the duty cycle, which appeared in the 1983 edition of the standard. The 1997 edition also slightly revised the consideration of minimum system voltage as a limiting factor to be more consistent with the cell-sizing worksheet incorporated by the method.

In addition to Annex B described above, the IEEE Std 485-1997 was also augmented with the following additional information:

- Section 7 discusses the potential need for calculating cell or battery terminal voltages at various times throughout the duty cycle.
- Annex C describes a method for calculating the cell/battery terminal voltage as a function of the duty cycle and provides two sample calculations, one using "fan" curves and one using "S" curves to describe the discharge characteristics of a given battery.
- Annex D provides a bibliography.

Annex A to IEEE Std 485-1997 provides battery- and cell-sizing examples. Included are example calculations that demonstrate how to properly select the number of cells, how the number of cells affects the required cell capacity, and how to use the cell-sizing worksheet to calculate the required cell size. However, Figure A.1 contains three typographical errors. In Section 4 of the figure, the positive values and the negative value for the Section 4 subtotal, "-800.2," are correct; however, the figure contains the following errors:

- The cell in Section 4, row 2, column 7 ("Neg Values"), is blank but should read "-640.2."
- The cell in Section 4, row 3, column 7 ("Neg Values"), currently reads "-40.2" but should read "0.0."
- The cell in Section 4, row 4, column 7 ("Neg Values"), is blank but should read "-160.0."

## C. REGULATORY POSITION

1. Conformance with the procedures defined in IEEE-Std 485-1997 (reaffirmed in 2003) provides methods acceptable to the NRC staff for complying with the design requirements as set forth in (1) 10 CFR 50.55a(a)(1), (2) 10 CFR 50.55a(h)(2) (as amended by the Federal Register notice of April 13, 1999), (3) 10 CFR 50.55a(h)(3), (4) 10 CFR 50.63(a)(2), and (5) GDC 1 and 17 of Appendix A to 10 CFR Part 50 as they relate to the requirements for defining dc loads and for sizing lead-acid batteries to supply that load for stationary battery applications in full-float operation for nuclear power plants, subject to the following stipulations:

- 1.1. Section 2, "References," which stipulates that this standard shall be used in conjunction with other IEEE standards, should be supplemented as follows:

For nuclear power generating stations, the recommended practice should also be used in conjunction with other pertinent publications. The pertinent publications include the following IEEE standards:

- (1) IEEE Std 308-2001, “Criteria for Class 1E Power Systems for Nuclear Power Generating Stations,” as endorsed by Regulatory Guide 1.32
- (2) IEEE Std 323-2003, “Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations,” as endorsed by Regulatory Guide 1.89
- (3) IEEE Std 336-2005, “Installation, Inspection, and Testing Requirements for Power, Instrumentation, and Control at Nuclear Facilities”
- (4) IEEE Std 344-1987, “Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations,” as endorsed by Regulatory Guide 1.100
- (5) IEEE Std 384-1992, “Standard Criteria for Independence of Class 1E Equipment and Circuits,” as endorsed by Regulatory Guide 1.75
- (6) IEEE Std 484-2002, “Recommended Practice for Installation Design and Installation of Vented Lead-Acid Batteries for Stationary Applications,” as endorsed by Regulatory Guide 1.128
- (7) IEEE Std 450-2002, “Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications,” as endorsed by Regulatory Guide 1.129
- (8) IEEE Std 946-2004, “IEEE Recommended Practice for the Design of DC Auxiliary Power Systems for Generating Stations”
- (9) IEEE Std 1187-2002, “Recommended Practice for Installation Design and Installation of Valve-Regulated Lead-Acid Storage Batteries for Stationary Applications”
- (10) IEEE Std 1188-2005, “Recommended Practice for Maintenance, Testing, and Replacement of Valve-Regulated Lead-Acid (VRLA) Batteries for Stationary Applications”
- (11) IEEE Std 1189-1996, “Guide for Selection of Valve-Regulated Lead-Acid (VRLA) Batteries for Stationary Applications”

1.2. The third paragraph of Section 6.2.2, “Design Margin,” which references Sections 6.3.1.5 and 6.3.3 of the IEEE Std 323-1983, should be supplemented as follows:

For nuclear power generating stations, the “margins” required by the applicable sections of the IEEE Std 323, as endorsed by Regulatory Guide 1.89, are to be applied during “qualification” and are not related to “design margin.”

1.3. Annex B is endorsed as an accepted method of converting constant power and constant resistance loads to constant current loads for purposes of defining the duty cycle for battery-sizing calculations.

1.4. Annex A to IEEE Std 485-1997 is informative and provides sample sizing demonstrations. Unless otherwise stated in a regulatory position, endorsement of the IEEE Std 485-1997 does not include this annex. Figure A.1 has the following three typographical errors:

- (1) The cell in Section 4, row 2, column 7 (“Neg Values”), is blank but should read “-640.2.”

- (2) The cell in Section 4, row 3, column 7 (“Neg Values”), currently reads “-40.2” but should read “0.0.”
- (3) The cell in Section 4, row 4, column 7 (“Neg Values”), is blank but should read “-160.0.”

1.5. Annex C is informative and provides a method for estimating battery terminal voltage at various points in the battery duty cycle using manufacturer’s typical discharge characteristics. Unless otherwise stated in a regulatory position, endorsement of the IEEE Std 485-1997 does not include this annex.

1.6. Annex D is informative and provides the bibliography. Unless otherwise stated in a regulatory position, endorsement of the IEEE Std 485-1997 does not include this annex.

## **D. IMPLEMENTATION**

The purpose of this section is to provide information to applicants and licensees regarding the NRC’s plans for using this draft regulatory guide. The NRC does not intend or approve any imposition or backfit in connection with its issuance.

The NRC has issued this draft guide to encourage public participation in its development. The NRC will consider all public comments received in development of the final guidance document. In some cases, applicants or licensees may propose an alternative or use a previously established acceptable alternative method for complying with specified portions of the NRC’s regulations. Otherwise, the methods described in this guide will be used in evaluating compliance with the applicable regulations for license applications, license amendment applications, and amendment requests.

# REGULATORY ANALYSIS

## 1. Statement of the Problem

Revision 2 to Regulatory Guide 1.128 endorsed the IEEE Std 484-2002 for installation design and installation of vented lead-acid storage batteries for nuclear power plants. The IEEE Std 484-2002, in turn, makes several references to the IEEE Std 485-1997.

Furthermore, the regulatory position stated in Revision 2 to Regulatory Guide 1.129 endorsed the use of the IEEE Std 450-2002 for the purposes of maintenance, testing, and replacement of vented lead-acid storage batteries for stationary applications with the stipulation that it should be used in conjunction with the IEEE Std 485-1997.

Therefore, publication of this regulatory guidance is necessary to provide guidance on the sizing of lead-acid batteries in support of licensing of new and currently operating reactors.

## 2. Objective

The objective of this regulatory action is to provide guidance on the sizing of lead-acid batteries in support of licensing of new and currently operating reactors.

## 3. Alternative Approaches

The NRC staff considered the following alternative approaches:

- Take no action.
- Publish a new Regulatory Guide.

### 3.1 Alternative 1: Take No Action

Under this alternative, the NRC would not publish battery-sizing guidance. This alternative is considered the baseline or “no action” alternative. However, if the NRC does not publish guidance on accepted approaches to battery sizing, the staff position may not be clear.

### 3.2 Alternative 2: Publish a New Regulatory Guide

Under this alternative, the NRC would publish a new Regulatory Guide, taking into consideration current regulations, standards, and related regulatory positions.

One benefit of this action is that it would enhance reactor safety by incorporating the latest technical information for guidance on the sizing of lead-acid batteries, and address the potential ambiguity associated with other regulatory guidance documents that reference IEEE Std 485-1997 or other IEEE standards that, in turn, reference IEEE Std 485-1997.

The cost to the NRC would be the one-time cost of issuing the revised regulatory guide (which is expected to be relatively small), and applicants would incur little or no additional cost.

#### **4. Conclusion**

Based on this regulatory analysis, the staff recommends that the NRC publish this new Regulatory Guide. The staff concludes that the proposed action will enhance reactor safety by providing an updated guidance on the sizing of lead-acid batteries.



## REFERENCES

1. *U.S. Code of Federal Regulations*, Title 10, *Energy*, Part 50, “Domestic Licensing of Production and Utilization Facilities,” U.S. Nuclear Regulatory Commission, Washington, DC.<sup>1</sup>
2. IEEE Std 485-1997, “IEEE Recommended Practice for Sizing of Lead-Acid Batteries for Stationary Applications.” IEEE, Piscataway, N.J. September 1997.<sup>2</sup>
3. IEEE Std. 603-1991, “IEEE Standard Criteria for Safety Systems for Nuclear Power Generating Stations,” IEEE, Piscataway, N.J. December 1991.
4. IEEE Std 308-1980, “IEEE Standard Criteria for Class 1E Power Systems for Nuclear Power Generating Stations.” IEEE, Piscataway, N.J. October 1980.
5. IEEE Std 308-2001, “IEEE Standard Criteria for Class 1E Power Systems for Nuclear Power Generating Stations.” IEEE, Piscataway, N.J. March 2002.
6. NUREG-1431, “Standard Technical Specifications Westinghouse Plants.” U.S. Nuclear Regulatory Commission, Washington DC, June 2004.
7. NUREG-1433, “Standard Technical Specifications General Electric Plants, BWR/4.” U.S. Nuclear Regulatory Commission, Washington DC, June 2004.
8. NUREG-1434, “Standard Technical Specifications General Electric Plants, BWR/6.” U.S. Nuclear Regulatory Commission, Washington DC, June 2004.
9. NUREG-1793, “Final Safety Evaluation Report Related to Certification of the AP1000 Standard Design.” U.S. Nuclear Regulatory Commission, Washington DC, September 2004.
10. NUREG/CR-6901, “Current State of Reliability Modeling Methodologies for Digital Systems and Their Acceptance Criteria for Nuclear Power Plant Assessments.” U.S. Nuclear Regulatory Commission, Washington DC, February 2006.
11. NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants.” U.S. Nuclear Regulatory Commission, Washington DC, March 2007.
12. IEEE Std 485-1983, “IEEE Recommended Practice for Sizing Large Lead Storage Batteries for Generating Stations and Substations,” IEEE, Piscataway, N.J. June 1983.
13. IEEE Std 484-2002, “IEEE Recommended Practice for Installation Design And Installation of Vented Lead-Acid Batteries for Stationary Applications.” IEEE, Piscataway, N.J. February 2003.
14. Regulatory Guide 1.128, “Installation Design and Installation of Vented Lead-Acid Storage

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<sup>1</sup> All NRC regulations, regulatory guides, and NUREG publications listed herein are available electronically through the Electronic Reading Room on the NRC’s public Web site, at <http://www.nrc.gov/reading-rm/doc-collections/cfr/>. Copies are also available for inspection or copying for a fee from the NRC’s Public Document Room (PDR) at 11555 Rockville Pike, Rockville, MD; the mailing address is USNRC PDR, Washington, DC 20555; telephone (301) 415-4737 or (800) 397-4209; fax (301) 415-3548; and email [PDR@nrc.gov](mailto:PDR@nrc.gov).

<sup>2</sup> IEEE publications may be purchased from the IEEE Service Center, which is located at 445 Hoes Lane, Piscataway, NJ 08855 (<http://www.ieee.org>, telephone (800) 678-4333).

- Batteries for Nuclear Power Plants.” U.S. Nuclear Regulatory Commission, Washington DC.
15. IEEE Std 450-2002, “IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications.” IEEE, Piscataway, N.J. April 2003.
  16. Regulatory Guide 1.129, “Maintenance, Testing, and Replacement of Vented Lead-Acid Storage Batteries for Nuclear Power Plants.” U.S. Nuclear Regulatory Commission, Washington DC.
  17. IEEE Std 1184-1994, “IEEE Guide for Batteries for Uninterruptible Power Supply Systems.” IEEE, Piscataway, N.J. June 1995.