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78 FR 15753

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May 23, 2013

Ms. Cindy K. Bladey, Chief
Rules, Announcements, and Directives Branch (RADB)
Office of Administration, Mail Stop: TWB–05–B01M
U.S. Nuclear Regulatory Commission
Washington, DC 20555–0001

Subject: **STARS Alliance Comments on Draft Regulatory Guide DG-1269; Maintenance, Testing, and Replacement of Vented Lead-Acid Storage Batteries for Nuclear Power Plants**

Reference: Docket ID NRC-2013-0048; Draft Regulatory Guide; Request for comment, dated March 12, 2013 (78 FR 15753)

Dear Ms. Bladey,

STARS Alliance submits the following comments in response to the referenced Federal Register notice soliciting comments on Draft Regulatory Guide DG-1296, "Maintenance, Testing, and Replacement of Vented Lead-Acid Storage Batteries." STARS appreciates the NRC request and the opportunity to comment on DG-1269.

Discussion Section "B" Page 5, third paragraph, last sentence and Staff Regulatory Guidance Section "C" Page 7, third paragraph, second sentence while discussing the various types of battery testing, suggest that the same type of battery test be used throughout the life of the battery for best trending results.

> *"For best trending results, the same test method or program should be used throughout the life of the battery".*
>
> *"However, it is preferred that the same test method be used throughout the battery life."*

There are three types of tests specified for batteries: 1) service test, 2) performance test, and 3) modified performance test. A modified performance test may substitute for either of the other two. IEEE-450 and Plant Technical Specifications specify service tests, typically at 18 month intervals and a performance test typically at 60 month intervals. If a modified performance test were substituted for either test, then in order to meet the suggestion in the draft guide, a station would have to always do the modified performance test.

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Add= E. O'Donnell (exo)
M. Case (MJC)

The modified performance test is a more rigorous test than the service test, discharging the battery further and thus putting more cycles on the battery. There are a finite number of discharge cycles for each battery; therefore, always performing the modified performance test would age the battery more rapidly. The deeper discharge is also undesirable from an outage perspective as it takes longer to discharge and subsequently recharge the battery and restore Operability. This may limit other outage activities or raise the risk profile while the battery is inoperable. It is recommended that DG-1269 recognize this trade-off rather than focus primarily on the trending consideration. Further, it is suggested that the optimum test regime should be to always perform a service test except when the more rigorous test is required (typically 5 years), then, perform a modified performance test. This sequence should be followed for the life of the battery, as practical.

If you have any questions on these comments, please contact me or Dennis Buschbaum at (254)-897-5851 or dennis.buschbaum@luminant.com.

Sincerely,

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Comments:

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FROM Scott Bauer
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