



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
November 8, 1991

Docket Nos. 50-269, 50-270
and 50-287

Mr. J. W. Hampton
Vice President, Oconee Site
Duke Power Company
P. O. Box 1439
Seneca, South Carolina 29679

Dear Mr. Hampton:

SUBJECT: OCONEE UNITS 1, 2, AND 3 - TECHNICAL SPECIFICATIONS FOR STANDBY
SHUTDOWN FACILITY POWER SYSTEM (TAC NOS. M66390/M66391/M66392)

In a July 26, 1985, letter, Duke Power Company (DPC) proposed changes to the plants' Technical Specifications to encompass operability and surveillance requirements for the Standby Shutdown Facility (SSF). Revisions to the proposed technical specification amendment were provided in letters dated August 14, 1987, August 12, 1988, August 21, 1990, and March 5, 1991. In order to complete our review, your response to the following issues is requested:

1. Current Standard Technical Specifications (STS) require that diesel generators be load tested for at least 60 minutes every month. Proposed Specification 4.20.3.a.2.a requires this quarterly. DPC should address/justify this departure from the guidance contained in STS's and Regulatory Guide (RG) 1.108, "Periodic Testing of Diesel Generator Units Used As Onsite Electric Power Systems At Nuclear Power Plants." The above tests are used to calculate reliability levels for emergency sources in responding to the Station Blackout (SBO) Rule as specified in RG 1.155. DPC should address how the proposed testing interval establishes equivalent reliability and confidence in the alternate AC (AAC) source.
2. Current STS's require that diesel generators be tested every 18 months to verify their capability to reject a load no less than their largest single emergency load and to reject their full load, and to verify that they can operate for at least 24 hours (22 hours at their continuous load rating, 2 hours at their 2 hour rating). Since the proposed Technical Specifications do not contain these surveillance requirements for the SSF power system, DPC should address/justify this departure from the guidance contained in current STS's and RG 1.108. DPC should also address these tests in relation to the use of the SSF power source as the AAC source for SBO.

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- 3. Current STS's require that the individual cell and total battery terminal voltages be measured under float conditions every 92 days. Also, the electrolyte level for each cell should be measured and the average cell electrolyte temperature (for a representative number of cells) should be calculated. Proposed Specification 4.20.3.b.2, containing the quarterly surveillance requirements for the SSF dc system, does not include these requirements. DPC should address/justify this departure from the guidance contained in current STS's and IEEE Std. 450-1975, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations" (as endorsed by RG 1.129, "Maintenance, Testing, and Replacement Of Large Lead Storage Batteries For Nuclear Power Plants").
- 4. Specification 4.20.3.b.3 contains the proposed annual surveillance requirements for the SSF dc system. In paragraph a. "batteries" should be replaced with "cells" and in paragraph b. "battery to battery" should be replaced with "cell-to-cell." Also, this specification does not contain the requirement to verify the resistance for battery connections. DPC should address/justify this departure from the guidance contained in current STS's and IEEE Std. 450-1975 as pertaining to annual battery connection resistance measurements.
- 5. Current STS's require a battery charger performance test every 18 months and a battery performance discharge test every 60 months. Since the proposed Technical Specifications do not contain these surveillance requirements, DPC should address/justify this departure from the guidance contained in current STS's and IEEE Std. 450-1975.
- 6. Specification 4.20.3.b.4 contains the proposed annual one hour discharge service test for the SSF batteries. The duration and load for this test should be based upon the plant's limiting SBO or standby shutdown requirements.

This requirement affects fewer than ten respondents, and therefore, is not subject to Office of Management & Budget review under P.L. 96-511.

Sincerely,

/s/

Leonard A. Wiens, Project Manager
Project Directorate II-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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