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Qualification of Safety-Related Vented Lead-Acid Storage Batteries for Nuclear Power Plants

Comment On: NRC-2017-0130-0001

Qualification of Safety-Related Vented Lead-Acid Storage Batteries for Nuclear Power Plants; Request for Comment on Draft Regulatory Guide

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Submitter Information

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General Comment

On page 3, the first sentence in the Background section states "Safety-related batteries and battery racks undergo a qualification program for the verification that the battery meets or exceeds its design specification throughout its installed life." Consider replacing "the battery" with "each battery" to clarify that the qualification program is not exclusive to one specific battery.

At the end of page 3, the clause "the predominant failure mechanism for the batteries are addressed" employs a singular subject and a plural verb. Consider changing the clause to "the predominant failure mechanism for the batteries is addressed" or "the predominant failure mechanisms for the batteries are addressed."

On page 4, the second sentence of the second full paragraph states "The type testing methodology provides qualification guidance for batteries to demonstrate the battery's capacity and capability to perform its design function." Consider replacing "the battery's capacity" with "each battery's capacity" to clarify that the type testing method is not exclusive to one specific battery.

At the end of page 4, the sentence "The IEEE Std. 450 (as endorsed by RG 1.129) and IEEE Std. 484 (as endorsed by RG 1.128) . . . provides the user with a general guide to qualify vented lead-acid batteries in nuclear power plants" employs a plural subject and a singular verb. Consider replacing "provides" with "provide."

On page 5, the third sentence of the second paragraph states "IAEA Safety Guide No. 34 address the management, verification, testing, and documentation of the electrical power systems design and

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components." The subject is singular, and the verb is plural. Consider replacing "address" with "addresses."

On page 5, the fifth sentence of the second paragraph states "There's additional applicable sections. . . ." The subject is plural, and the verb is singular. Consider replacing "There's" with "There are."

Throughout the Regulatory Guide, the word "methodology" is used where "method" is more appropriate. Refer to Section 7 of the NRC Editorial Style Guide (NUREG-1379), which discusses the use of plain language.