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**Subject:** Discussion Topics for April 10th Public Teleconference with Vistra OpCo  
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Good afternoon Jack,

I would like to provide you with some NRC staff topics of discussion during the upcoming public teleconference on April 10<sup>th</sup> regarding a proposed change to Technical Specification (TS) 3.8.4, Condition B. These discussion points were generated based on your slides you provided earlier this week. I will place this email into ADAMS to include it as part of the public meeting records.

1. Is the licensee only seeking NRC approval of completion time extension for replacing the cells? Has the licensee replaced cells in the past? If yes, how many hours did it take? How many cells were involved? Which Unit was affected? How many battery train and channels are involved? If battery jar leaking electrolyte is the concern for operability, is it limited to only certain channel or trains? Has common cause failure concerns been evaluated?
2. Is the licensee planning to submit a risk-informed submittal? If not, why not?
3. If a battery channel or train is declared inoperable for 18 hours during the cell replacement at power, is there a supplemental battery available to provide defense-in depth measure as discussed in Branch Technical Position 8-8?
4. What are the ages of batteries? What are the capacity margins of the batteries based on the last surveillance tests?
5. It appears that licensee is planning to add two more cells to the existing design (from 60 cells to 62 cells) during the upcoming Refueling outages. Is the licensee requesting NRC approval of this licensing/design basis change? Is the seismic qualification requirements reestablished by analyses and tests? Will the hydrogen and HVAC requirements be re-evaluated? Has the battery sizing and duty cycle calculations been revised? Will any TS surveillance requirements need to be revised? If the replacement is done under 10 CFR 50.59, discuss how you arrived at that determination?

Thank you,

**Maggie Watford O'Banion**

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