ATTACHMENT 2

LIMERICK GENERATING STATION Units 1 and 2

Docket Nos. 50-352 50-353 License Nos. NPF-39 NPF-85

Response to Request For Additional Information Battery Surveillance Extensions Included in Technical Specifications Change Request to Support 24-Month Refueling Cycles

PROPOSED TECHNICAL SPECIFICATION CHANGES

List of Attached Pages

Unit 1 3/4 8-11 3/4 8-12 B 3/4 8-2 Unit 2 3/4 8-11 3/4 8-12 B 3/4 8-2

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 92 days and within 7 days after a battery discharge with battery terminal voltage below 105 volts or battery overcharge with battery terminal voltage above 150 volts, by verifying that:
 - 1. The parameters in Table 4.8.2.1-1 meet the Category B limits,
 - There is no visible corrosion at either terminals or connectors, or the connection resistance of these items is less than 150 x 10⁻⁶ ohm, and
 - 3. The average electrolyte temperature of each sixth cell is $\geq 60^{\circ}$ F.
- c. By verifying that:
 - At least once per 18 months the cells, cell plates and battery racks show no visual indication of physical damage or abnormal deterioration,
 - At least once per 18 months the cell-to-cell and terminal connections are clean, tight, free of corrosion and coated with anticorrosion material.
 - At least once per 18 months the resistance of each cellto-cell and terminal connection is less than or equal to 150 x 10⁻⁶ ohm excluding cable intercell connections, and
 - At least once per 24 months the battery chargers will supply the currents listed below at a minimum of 132 volts for at least 8 hours.

Charger	Current (Amperes)
1BCA1	300
1BCA2	300
1BCB1	300
1BCB2	300
1BCC	75
1BCD	75

- d. At least once per 24 months by verifying that either:
 - The battery capacity is adequate to supply and maintain in OPERABLE status all of the actual emergency loads for the design duty cycle when the battery is subjected to a battery service test, or
 - The battery capacity is adequate to supply a dummy load of the following profile while maintaining the battery terminal voltage greater than or equal to 105 volts for the nominal 125-volt batteries and 210 volts for the nominal 125/250-volt batteries:

CHEVETLLANCE	DEGITIDEMENTS	(Continued)
DORACTERMOL	NEVVINENLAID	(CONCINUED]

	LOAD CYCLE (amps)			
Division Ba	Battery	<u>0-1 Min.</u>	<u>1-239 Min.</u>	239-240 Min.
I	1A1 1A2	546 449	168 129	187 147
II	1B1 1B2	889 823	158 119	321 282
III	10	193	31	31
IV	1D	169	21	21

Each 125/250-volt battery is rated at 1500 ampere-hours at an 8-hour discharge rate, based on a terminal voltage of 1.75 volts-per-cell at $77\,^{\circ}$ F.

Each 125-volt battery is rated at 250 ampere-hours at an 8-hour discharge rate, based on a terminal voltage of 1.75 volts-per-cell at 77°F.

- e. At least once per 60 months by verifying that the battery capacity is at least 80% of the manufacturer's rating when subjected to a performance discharge test. At this once per 60 month interval, this performance discharge test may be performed in lieu of the battery service test (Specification 4.8.2.1.d).
- f. At least once per 18 months performance discharge tests of battery capacity shall be given to any battery that shows signs of degradation or has reached 85% of the service life expected for the application. Degradation is indicated when the battery capacity drops more than 10% of rated capacity from its average on previous performance tests, or is below 90% of the manufacturer's rating.

BASES

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

"Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977 except for paragraphs C.2.a(3), C.2.c(1), C.2.c(2), C.2.d(3) and C.2.d(4), and the periodic testing will be performed at least once per 24 months. The exceptions to Regulatory Guide 1.108 allow for gradual loading of diesel generators during testing and decreased surveillance test frequencies (in response to Generic Letter 84-15).

The surveillance requirements for demonstrating the OPERABILITY of the unit batteries are in accordance with the recommendations of Regulatory Guide 1.129 "Maintenance Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," February 1978 and IEEE Std 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations," except that certain tests will be performed at least once every 24 months.

Verifying average electrolyte temperature above the minimum for which the battery was sized, total battery terminal voltage on float charge, connection resistance values and the performance of battery service and discharge tests ensures the effectiveness of the charging system, the ability to handle high discharge rates and compares the battery capacity at that time with the rated capacity.

Table 4.8.2.11 specifies the normal limits for each designated pilot cell and each connected cell for electrolyte level, float voltage and specific gravity. The limits for the designated pilot cells float voltage and specific gravity, greater than 2.13 volts and 0.015 below the manufacturer's full charge specific gravity or a battery charger current that had stabilized at a low value, is characteristic of a charged cell with adequate capacity. The normal limits for each connected cell for float voltage and specific gravity, greater than 2.13 volts and not more than 0.020 below the manufacturer's full charge specific gravity with an average specific gravity of all the connected cells not more than 0.010 below the manufacturer's full charge specific gravity, ensures the OPERABILITY and capability of the battery.

Operation with a battery cell's parameter outside the normal limit but within the allowable value specified in Table 4.8.2.1-1 is permitted for up to 7 days. During this 7-day period: (1) the allowable value for electrolyte level ensures no physical damage to the plates with an adequate electron transfor capability; (2) the allowable value for the average specific gravity of all the cells, not more than 0.020 below the manufacturer's recommended full charge specific gravity ensures that the decrease in rating will be less than the safety margin provided in sizing; (3) the allowable value for an individual cell's specific gravity, ensures that an individual cell's specific gravity will not be more than 0.040 below the manufacturer's full charge specific gravity and that the overall capability of the battery will be maintained within an acceptable limit; and (4) the allowable value for an individual cell's float voltage, greater than 2.07 volts, ensures the battery's capability to perform its design function.

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 92 days and within 7 days after a battery discharge with battery terminal voltage below 105 volts or battery overcharge with battery terminal voltage above 150 volts, by verifying that:
 - 1. The parameters in Table 4.8.2.1-1 meet the Category B limits,
 - There is no visible corrosion at either terminals or connectors, or the connection resistance of these items is less than 150 x 10⁻⁶ ohm, and
 - 3. The average electrolyte temperature of each sixth cell is \geq 60°F.
- c. By verifying that:
 - At least once per 18 months the cells, cell plates and battery racks show no visual indication of physical damage or abnormal deterioration,
 - At least once per 18 months the cell-to-cell and terminal connections are clean, tight, free of corrosion and coated with anticorrosion material,
 - At least once per 18 months the resistance of each cellto-cell and terminal connection is less than or equal to 150 x 10⁻⁶ ohm excluding cable intercell connections, and
 - 4. At least once per 24 months the battery chargers will supply the currents listed below at a minimum of 132 volts for at least 8 hours:

Charger	Current (Amperes
2BCA1	300
2BCA2	300
2BCB1	300
2BCB2	300
2BCC	75
2BCD	75

- d. At least once per 24 months by verifying that either:
 - 1. The battery capacity is adequate to supply and maintain in OPERABLE status all of the actual emergency loads for the design duty cycle when the battery is subjected to a battery service test, or
 - 2. The battery capacity is adequate to supply a dummy load of the following profile while maintaining the battery terminal voltage greater than or equal to 105 volts for the nominal 125-volt batteries and 210 volts for the nominal 125/250-volt batteries:

SURVEILLANCE REQUIREMENTS (Continued)

	LOAD CYCLE (amps)			
Division	Battery	<u>0-1 Min.</u>	<u>1-239 Min.</u>	239-240 Min.
I	2A1 2A2	546 449	168 129	187 147
II	2B1 2B2	889 823	158 119	321 282
III	2C	193	31	31
IV	2D	169	21	21

Each 125/250-volt battery is rated at 1500 ampere-hours at an 8-hour discharge rate, based on a terminal voltage of 1.75 volts-per-cell at 77°F.

Each 125-volt battery is rated at 250 ampere-hours at an 8-hour discharge rate, based on a terminal voltage of 1.75 volts-per-cell at 77°F.

e. At least once per 60 months by verifying that the battery capacity is at least 80% of the manufacturer's rating when subjected to a performance discharge test. At this once per 60 month interval, this performance discharge test may be performed in lieu of the battery service test (Specification 4.8.2.1.d).

11

f. At least once per 18 months performance discharge tests of battery capacity shall be given to any battery that shows signs of degradation or has reached 85% of the service life expected for the application. Degradation is indicated when the battery capacity drops more than 10% of rated capacity from its average on previous performance tests, or is below 90% of the manufacturer's rating.

BASES

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

Supplies," March 10, 1971, Regulatory Guide 1.137, "Fuel-Oil Systems for Standby Diesel Generators," Revision 1, October 1979 and Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977 except for paragraphs C.2.a(3), C.2.c(1), C.2.c(2), C.2.d(3) and C.2.d(4), and the periodic testing will be performed at least once per 24 months. The exceptions to Regulatory Guide 1.108 allow for gradual loading of diesel gene ators during testing and decreased surveillance test frequencies (in response to Concric Letter 84-15).

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Verifying average electrolyte temperature above the minimum for which the battery was sized, total battery terminal voltage on float charge, connection resistance values and the performance of battery service and discharge tests ensures the effectiveness of the charging system, the ability to handle high discharge rates and compares the battery capacity at that time with the rated capacity.

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ATTACHMENT 3

LIMERICK GENERATING STATION Units 1 and 2

Docket Nos. 50-352 50-353 License Nos. NPF-39 NPF-85

Response to Request For Additional Information Battery Surveillance Extensions Included in Technical Specifications Change Request to Support 24-Month Refueling Cycles

Sample of Battery Service Test Results

HISTORICAL SURVEILLANCE DATA LIMERICK GENERATING STATION UNIT 1 DIVISION 1 BATTERIES SERVICE TEST RESULTS

BATTERY IAIDIOI

DATE	TEST TIME ELAPSED	VOLTAGE *	
7-12-85	0 brs 0 mins 0 brs 1 mins 0 brs 20 mins 1 brs 53 mins 3 brs 3 mins 3 brs 59 mins	119.2 Vdc 118.6 Vdc 119.7 Vdc 119 Vdc 118 Vdc 118 Vdc 116.8 Vdc	
5-24-86	0 hrs 0 mins 0 hrs 1 mins 0 hrs 15 mins 1 hrs 57 mins 3 hrs 11 mins 3 hrs 39 mins 4 hrs 0 mins	118.2 Vdc 118.4 Vdc 119.8 Vdc 119 Vdc 118 Vdc 118 Vdc 117 Vdc 118.7 Vdc	
5-22-87	O hers 74 mins 1 hers 4 mins 2 her 19 mins 3 hers 33 mins 3 hers 59 mins	119.8 Vde 119 Vde 118 Vde 117 Vde 116.3 Vde	
6-25-87	0 hrs 20 mins 1 hrs 20 mins 2 hrs 27 mins 3 hrs 26 mins	119.7 Vdc 119 Vdc 118 Vdc 117 Vdc	
10-1-50	0 hrs 15 mins 1 hrs 11 mins 2 hrs 40 mins 3 hrs 51 mins 4 hrs 0 mins	119.3 Vác 119 Vác 118 Vác 117 Vác 118.5 Vác	

BATTERY 1A2D101

DATE	TEST TIME ELAPSED	VOLTAGE *	
7-12-85	0 hes 0 mins 0 hes 40 mins 1 hes 25 mins 3 hes 12 mins 3 hes 55 mins	120 Vdc 120.3 Vdc 120 Vdc 119 Vdc 119.8 Vdc	
5-31-85	0 hrs 0 mins 0 hrs 1 mins 0 hrs 1 mins 0 hrs 21 mins 1 hrs 16 mins 3 hrs 1 mins 3 hrs 59 mins 4 hrs 0 mins	121.6 Vde 115.6 Vde 119.6 Vde 120.7 Vde 120. Vde 119. Vde 118.4 Vde 118.1 Vde 119.6 Vde	
5-23-87	0 iars 28 minas 2 iars 40 mina 3 iars 59 mina	119.8 Vde 119 Vde 118 Vde	
6-25-87	0 hes 34 mitus 2 hes 39 mitus 3 hes 59 mitus	115.9 Vdc 119 Vdc 118 Vdc	

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* surveillance test acceptance criterion = 105 Vdc