



A Centenor Energy Company

Docket Number 50-346

License Number NPF-3

Serial Number 1695

August 24, 1989

DONALD C. SHELTON  
Vice President—Nuclear  
(419) 248-2300

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Subject: Technical Specification Battery Surveillance Requirements (TAC  
Number 73611)

Gentlemen:

The Nuclear Regulatory Commission (NRC) letter dated March 12, 1988 (Log Number 2232), issued Amendment Number 100 to Facility Operating License Number NPF-3 for the Davis-Besse Nuclear Power Station, Unit Number 1. Amendment Number 100 revised Appendix A, Technical Specification Section 3/4.8.2.3, D.C. Distribution - Operating, to be consistent with the model technical specifications for station batteries provided by the NRC in a letter to Toledo Edison dated July 16, 1981 (Log Number 756).

Prior to issuance of Amendment Number 100, Toledo Edison identified a potential problem related to the interpretation of Surveillance Requirement 4.8.2.3.2 to the NRC staff during a telephone call on February 25, 1988. Specifically, Surveillance Requirements 4.8.2.3.2.a.1 and 4.8.2.3.2.a.2 require verification of pilot cell parameters and battery terminal voltage while on float charge, at least once per seven days.

This surveillance requirement could be misinterpreted to preclude verification of these battery and pilot cell parameters while the battery is undergoing an equalizing charge. Equalizing charges can take as long as 148 hours. With this interpretation, a battery may unnecessarily be considered inoperable if Surveillance Requirements 4.8.2.3.2.a.1 and 4.8.2.3.2.a.2 were due and could not be satisfied because the battery was on equalizing charge.

During the February 25, 1988, telephone call and subsequently in the NRC letter dated March 12, 1988 (Log Number 2232) issuing Amendment Number 100, the NRC staff acknowledged that such an interpretation would be incorrect and that equalizing charges had not been considered in the model technical specifications. The staff stated that the parameters are intended to provide guidance as to the condition of the batteries. The inability to observe a true float voltage during an equalizing charge does not result in a violation of the Surveillance Requirement nor does it result in an inoperable battery.

8908310109 890824  
PDR ADDCK 05000346 PNU  
P

A001  
1/10

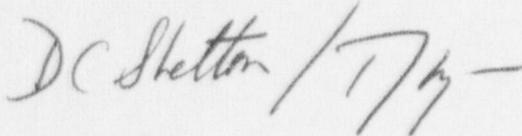
In the February 25, 1988 telephone call and as acknowledged in the NRC March 12, 1988 letter, Toledo Edison had indicated its intention to submit an amendment request to clarify the surveillance requirements, even though they conform with NRC model technical specifications. Toledo Edison has reevaluated the need to revise the Surveillance Requirements in view of the above clarification. Toledo Edison understands that it is preferable to perform Surveillance Requirements 4.8.2.3.2.a.1 and 4.8.2.3.2.a.2 with the battery on float charge. Equalizing charges, which generally take less than 148 hours to complete, are performed only about once per year, consistent with vendor recommendations, industry standards and in response to surveillance test results. Since Technical Specification 4.0.2 allows extension of surveillance intervals by 25%, it will rarely be necessary to complete the seven day interval Surveillance Requirements while the battery is on equalizing charge. On those rare occasions, the above clarification provides the necessary flexibility.

Clarification of the Surveillance Requirements does not warrant the expenditure of the NRC and Toledo Edison resources which would be required to process such a relatively low priority license amendment. Accordingly, Toledo Edison no longer plans to submit an amendment request to clarify Surveillance Requirements 4.8.2.3.2.a.1 and 4.8.2.3.2.a.2.

Toledo Edison plans to incorporate the above clarification into the weekly battery surveillance test procedure. The procedure will indicate that the tests should normally be accomplished with the battery on float charge, but if the surveillance test is due, it may be performed while the battery is on equalizing charge.

If you have any questions concerning this matter, please contact Mr. R. W. Schrauder, Nuclear Licensing Manager, at (419) 249-2366.

Very truly yours,

Handwritten signature of DC Shelton, dated 1/17/88.

PWS/dlm

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector  
A. B. Davis, Regional Administrator, NRC Region III  
T. V. Wambach, DB-1 NRC Senior Project Manager