



Palo Verde Nuclear
Generating Station

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102-04366-CDM/SAB/RKR

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U. S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Reference: Letter 102-04356-CDM/SAB/RKR, dated October 8, 1999, from C. D. Mauldin, APS, to NRC, "Proposed Amendment to Technical Specification Section 3.8.4, "DC Sources - Operating" Under Exigent Circumstances."

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1 and 3
Docket Nos. STN 50-528/530
Response to NRC Request for Additional Information**

In an October 28, 1999, phone call between NRC and PVNGS staffs, the NRC staff requested additional information to complete their review of the proposed amendment to Technical Specifications submitted in reference 1. Specifically the NRC staff requested additional information regarding the adequacy of the battery charging method following discharge testing.

The battery vendor performed a series of tests in 1996 to determine the optimum method for charging batteries following performance (deep discharge) tests. The vendor tested seven groups of batteries using different charging methodologies following deep discharges. The testing identified an optimum charging methodology that maximized battery capacity recovery following a deep discharge. The battery group that was tested using the optimum method was deep discharged and recharged nine consecutive cycles varying the duration of the recharge. The testing showed that battery capacity remained above 100% in all but the last two tests. In all cases the capacity was well above the 90 percent minimum required by Technical Specifications.

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PVNGS adopted the optimum charging method recommended by the battery vendor based on this testing and uses it following both service and performance tests. Based on the vendor testing, the charging method used, and operating experience with the Unit 1 batteries; PVNGS is confident that the Unit 1 batteries are capable of supplying over 100 percent of their rated capacity following the recharge from the battery service test.

In reference 1, Arizona Public Service Company (APS) requested the proposed Technical Specification amendment be processed under exigent circumstances in accordance with 10 CFR 50.91(a)(6). APS still maintains the position that this amendment merits NRC approval prior to startup from the current refueling outage. Without exigent approval, APS will be forced to consider extending the current outage or planning for an additional outage in early December 1999 to perform the required Technical Specification surveillance.

No commitments are being made to the NRC by this letter.

Should you have any questions, please contact Scott A. Bauer at (623) 393-5978.

Sincerely,



CDM/SAB/RKR/kg

cc: E. W. Merschoff
M. B. Fields
J. H. Moorman
A. V. Godwin