UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 29, 1999

MEMORANDUM TO: José A. Calvo, Chief
Electrical & Instrumentation and Controls Branch
Division of Engineering, NRR

FROM: William D. Beckner, Chief
Technical Specifications Branch
Division of Regulatory Improvement Programs, NRR

SUBJECT: STANDARD TECHNICAL SPECIFICATIONS, DC SOURCES - OPERATION, DC SOURCE - SHUTDOWN, AND BATTERY PARAMETERS

We will be forwarding a letter transmitting the final drafts of Standard Technical Specifications (STS) 3.8.4, "DC Sources - Operating," 3.8.5, "DC Sources - Shutdown," and 3.8.6, "Battery Parameters" to the industry. Your concurrence will culminate a multi-year effort by staff, industry and the IEEE to produce a consensus revision of these specifications. As discussed below, these specifications have the consensus support of the IEEE Nuclear Task Force (NTF), have industry support, and address all of the questions raised by your staff.

In order to achieve the needed consensus, on September 20, 1999, the industry, the staff, and the IEEE NTF held a public meeting. Following the meeting, we sent a consolidated draft of the specifications to the meeting participants in a letter dated September 29, 1999, and requested comments back by October 8, 1999. Subsequently, the IEEE NTF met on October 4, 1999, and reached consensus on the specifications. The IEEE NTF reached technical agreement on the specifications in combination with comments provided by the Technical Specification Task Force (TSTF) (Attachment 1). The comments of the TSTF, received October 1, 1999, and the comments of the IEEE NTF, received October 5, 1999, have been incorporated into the attached revision.

On October 22, 1999, we received your comments on the consolidated draft STS. We have addressed each of your comments in Attachment 2. Several of your comments were similar to comments made by the TSTF and have been incorporated into the final draft. Some of your comments related to the use of a battery cell float voltage of 2.07 as the limit that requires action in the STS. This issue was discusses at length at the September 20 meeting and the technical experts have agreed that it is the correct limit for operability. In addition, 2.07 V is listed as the "allowable limit" in the current version of the STS.

With regard to your comment concerning the reviewer's note in 3.8.6, no regulatory basis could be established to require maintenance actions such as voltage monitoring above the operability limit (2.07 volts) in technical specifications. Therefore, establishment of a program outside of technical specifications to manage such monitoring levels is appropriate and IEEE-450 is the suitable standard. Licensees must commit to such a program in order to adopt the new version of STS 3.8.6.

Several of your comments addressed the proposed Completion Time of 12 hours for an

inoperable battery. In response to your comments, we have decided to retain the current STS Completion Time of 2 hours in brackets in the final draft of STS 3.8.4, and the Bases will explain that any licensee wishing to request a longer Completion Time will need to demonstrate that the longer Completion Time is appropriate for that plant following the guidance in Regulatory Guide (RG) 1.177, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Technical Specifications,". RG 1.177 provides guidance for using a risk-informed method for determining Completion Times.

Thank you for your support in this important activity. We believe that these revisions, provided in Attachment 3, meet the reactor program goals of maintaining adequate safety, increasing effectiveness and efficiency, and reducing unnecessary burden.

Attachments: As stated

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