Kelly Clayton

From: Matthew McConnell
Sent: Thursday, August 28, 2008 2:24 PM
To: Michael Hay
Cc: Greg Warnick; George Wilson; Roy Mathew; Sheila Ray; Prem Sahay; Gurcharan Matharu; Russ Bywater; Kelly Clayton
Subject: FW: Regulatory Check

Mike,

I spoke with OGC earlier today concerning the SONGS battery service test requirements. (b)(5) We hope this helps move the issue forward. Please give me a call if you have any questions.

Matt

From: Sherwin Turk
Sent: Thursday, August 28, 2008 2:20 PM
To: Matthew McConnell
Subject: RE: Regulatory Check

(b)(5)

From: Sherwin Turk
Sent: Wednesday, August 27, 2008 11:29 AM
To: Matthew McConnell
Subject: RE: Regulatory Check

Matt - per our extended discussion this morning, please send me the actual words of the SR and the FSAR, then let's get together tomorrow to discuss the final approach.

From: Matthew McConnell
Sent: Wednesday, August 27, 2008 10:54 AM
To: Sherwin Turk
Cc: George Wilson
Subject: Regulatory Check
Importance: High

Sherwin,

Do you have any estimate as to when you think you can complete the request I sent you last week?

Thanks in advance.

Matt

Information in this record was deleted in accordance with the Freedom of Information Act, exemptions 5
FOIA- 2011-0157

From: Matthew McConnell
Sent: Thursday, August 21, 2008 1:31 PM
To: Sherwin Turk

E11

Cc: George Wilson
Subject: Regulatory Check
Importance: High

Sherwin,

My supervisor, George Wilson (Branch Chief of the Electrical Engineering Branch in NRR), spoke with Ed Williamson a couple of days ago about getting OGC assistance with a current regulatory matter involving San Onofre Nuclear Generating Station (SONGS). Ed directed George to work with you on this issue.

(b)(5)

Paragraph 50.36(c)(3) of Title 10 of the *Code of Federal* Regulations (10 CFR), "Technical Specifications," requires that Technical Specifications include Surveillance Requirements, which "are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

SONGS is committed to Regulatory Guide (RG) 1.129, Revision 1, "Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Nuclear Power Plants." SONGS Technical Specification Surveillance Requirements for demonstrating the operability of the station batteries are based on the recommendations of RG 1.129 and the Institute of Electrical and Electronics Engineers (IEEE) Standard (Std.) 450-1980 with the exception that battery service tests are performed during refueling operation with interval between tests not exceeding 24 months. IEEE Std. 450-1980 requires the discharge rate and test length for the service test to correspond as closely as possible to the battery duty cycle.

SONGS Technical Specification Surveillance Requirement 3.8.4.7 requires the licensee to verify that the battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test every 24 months. The battery service test is a special test of the battery capability, as found, to satisfy the design requirements (i.e., the battery duty cycle) of the direct current (DC) electrical power system.

(b)(5)

RG 1.155, "Station Blackout," which SONGS is committed to, describes a method acceptable to the NRC staff for complying with the Commission regulation that requires nuclear power plants to be capable of coping with a station blackout for a specified duration. This RG applies to all light-water-cooled nuclear power plants. RG 1.155 references that General Design Criterion (GDC) 1, "Quality standards and records," and GDC 18, "Inspection and Testing of Electric Power Systems," of Appendix A to 10 CFR Part 50 apply-to safety-related equipment needed to cope-with station blackout and other safety functions. GDC 1 requires, in part, that structures, systems, and components important to safety shall be designed, fabricated, erected, and tested to

quality standards commensurate with the importance of the safety functions to be performed. Where generally recognized codes and standards are used, they shall be identified and evaluated to determine their applicability, adequacy, and sufficiency and shall be supplemented or modified as necessary to assure a quality product in keeping with the required safety function. GDC 18 includes a requirement for appropriate periodic testing and inspection of electric power systems important to safety. In addition, Criterion III, "Design Control," of Appendix B to 10 CFR Part 50, requires that measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in § 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions. Criterion XI, "Test Control," of Appendix B to 10 CFR Part 50 requires that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

(b)(5)

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