

Response to Public Comments on Draft Regulatory Guide (DG)-1338

“Qualification of Safety-Related Vented Lead-Acid Storage Batteries for Nuclear Power Plants”

Proposed Revision 1 of Regulatory Guide (RG) 1.158

On May 31, 2017, the NRC published a notice in the *Federal Register* (82 FR 24996) that Draft Regulatory Guide, DG-1338 (Proposed Revision 1 of RG 1.158), was available for public comment. The public comment period ended on July 31, 2017. The NRC received comments from the organizations listed below. The NRC has combined the comments and NRC staff responses in the following table.

Comments were received from the following:

Michael Berg
 First Energy Nuclear Operating Company
 76 South Main Street
 Akron, Ohio 44308
 ADAMS Accession No. ML17207A103

Commenter	Section of DG-1338	Specific Comments	NRC Resolution
Michael Berg	Section B Discussion/Background	Safety-related batteries and battery racks undergo a qualification program for the verification that the battery meets or exceeds its design specification throughout its installed life." Consider replacing "the battery" with "each battery" to clarify that the qualification program is not exclusive to one specific battery.	The NRC staff agreed with the comment and made changes to the RG. The revision included the replacement of the “battery” to “each battery” to ensure it is not exclusive to one particular battery.
Michael Berg	Section B Discussion/Background	The predominant failure mechanism for the batteries are addressed" employs a singular subject and a plural verb. Consider changing the clause to "the predominant failure mechanism for the batteries is addressed" or "the predominant failure mechanisms for the batteries are addressed.	The NRC staff agreed with the comment and made changes to the RG. The revision included “the predominant failure mechanism for the batteries is addressed.”

Commenter	Section of DG-1338	Specific Comments	NRC Resolution
Michael Berg	Section B Discussion/Background	The type testing methodology provides qualification guidance for batteries to demonstrate the battery's capacity and capability to perform its design function. Consider replacing "the battery's capacity" with "each battery's capacity" to clarify that the type testing method is not exclusive to one specific battery.	The NRC staff agreed with the comment and made changes to the RG. The revision replaced "the battery's capacity and capability" with "each battery's capacity and capability" to clarify that the type of testing is not exclusive to one particular battery.
Michael Berg	Section B Discussion/Background	The IEEE Std. 450 (as endorsed by RG 1.129) and IEEE Std. 484 (as endorsed by RG 1.128) provides the user with a general guide to qualify vented lead-acid batteries in nuclear power plants employs a plural subject and a singular verb. Consider replacing "provides" with "provide."	The NRC staff agreed with the comment. However, the section was deleted because it was duplicative of a regulatory position in Section C.
Michael Berg	Section B Discussion/Background	IAEA Safety Guide No. 34 address the management, verification, testing, and documentation of the electrical power systems design and components. The subject is singular, and the verb is plural. Consider replacing "address" with "addresses."	The NRC staff agreed with the comment and made changes to the RG. The revision replaced the verb "address" with "addresses."
Michael Berg	Section B Discussion/Background	"There's additional applicable sections " The subject is plural, and the verb is singular. Consider replacing "There's" with "There are."	The NRC staff agreed with the comment and made changes to the RG. The revision replaced "there's" with "there are."
Michael Berg	Throughout the RG	The word "methodology" is used where "method" is more appropriate. Refer to Section 7 of the NRC Editorial Style Guide (NUREG-1379), which discusses the use of plain language.	The NRC staff agreed with the comment and made the appropriate changes to ensure there is a proper use of plain language.