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 RECIPIENT NAME: Document Control Branch (Document Control Desk)
 RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to License NPF-21, relocating battery profiles of Surveillance Requirement 4.8.2.1.d.2 to FSAR & modifying surveillance requirement to refer to FSAR for specific details of profile.

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June 25, 1992
G02-92-153

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: NUCLEAR PLANT NO. 2 OPERATING LICENSE NPF-21,
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 4.8.2.1,
BATTERY LOAD PROFILES, SUPPLEMENTARY INFORMATION

References: 1) Letter, G02-91-064, GC Sorensen (SS) to NRC, same subject,
dated April 4, 1991
2) Letter, G02-92-081, GC Sorensen (SS) to NRC, same subject,
dated April 6, 1992

Reference 1 requested that the battery load profiles of Surveillance Requirement 4.8.2.1.d.2 be relocated to the Final Safety Analysis Report (FSAR) and the Surveillance Requirement be modified to refer to the FSAR for the specific details of the profiles. The specific Technical Specification page (3/4 8-13) was attached indicating both relocation of the battery load profile table and additional wording to refer to the FSAR for details.

Reference 2 requested that the phrase "of the following profile" be deleted. The phrase could be misleading and did not add to the meaning of the Technical Specification.

Further, discussion with the Staff has brought into question the phrase "as described in the Final Safety Analysis Report" which was proposed as part of the change requested by Reference 1. The specific reference to the Final Safety Analysis Report (FSAR), if approved, could cause that specific FSAR section to have the same Regulatory status as the Technical Specifications. This was not the intent of the proposed change. Accordingly, this letter requests that the phrase "as described in the Final Safety Analysis Report" not be included in the Staff's review of the requested change. Attached is a draft of the total change including deletion of both phrases.

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 4.8.2.1,
BATTERY LOAD PROFILES

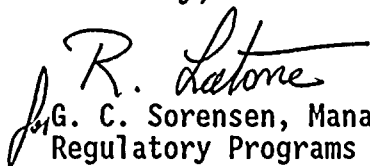
The remainder of the requested Technical Specification change adequately describes the necessary requirements to assure the batteries are tested to the correct load profiles:

"The battery is adequate to supply a dummy load (minimum amperage) based on anticipated loads required during loss-of-offsite power (LOOP) and loss-of-coolant accident (LOCA) conditions."

As stated in Reference 1, the FSAR will continue to provide guidance as to how the Technical Specification is to be satisfied.

With the FSAR guidance and the precise requirements stated in the Technical Specifications assurance is provided that the batteries will continue to be tested to the correct load profiles. As such, deletion of this additional phrase does not impact the intent of the original request nor does it affect the conclusions of Reference 1. The determination that the requested change (less the phrase referencing the FSAR) does not represent a significant hazard remains valid as does the conclusion that the change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and does not require an environmental assessment.

Sincerely,


G. C. Sorensen, Manager
Regulatory Programs (Mail Drop 280)

PLP/bk
Attachment

cc: JB Martin - NRC RV
NS Reynolds - Winston & Strawn
R Assa - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A
RG Waldo - EFSEC

