

## WESTINGHOUSE NUCLEAR TECHNOLOGY DIVISION

TITLE BYRON PUMP AND VALVE OPERABILITY SUMMARY				PAGE 1 OF 11	
PROJECT CAE/CBE	AUTHOR MARK KAMENIC	DATE 6/8/83	CHK'D BY J.M.S.	DATE 6-10-83	
SO	CALC NO. CAE-05-01	FILE NO.	GROUP EQT		

REPORT NO. CAE-05-01

PUMP AND VALVE OPERABILITY  
SUMMARY FOR  
BYRON UNITS 1+2  
CAE/CBE

WESTINGHOUSE ELECTRIC CORPORATION  
P.O. BOX 350  
PITTSBURGH, PA. 15230

PREPARED BY Mark Kamenic 6/10/83  
MARK KAMENIC

VERIFIED BY John M. Snider 6-10-83  
John M. Snider

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WESTINGHOUSE FORM 552130

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PDR ADOCK 05000454  
A PDR

## WESTINGHOUSE NUCLEAR TECHNOLOGY DIVISION

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PROJECT		AUTHOR		DATE		CHK'D BY									
CAE/CBE		MARK KAMENIC 6/8/83		J.M.S. 6/10/83											
S.O.		CALC NO.		FILE NO.		GROUP									
		CAE-02-01				EQT									
<p style="text-align: center;">RECORD OF REVISIONS</p> <table border="1"> <thead> <tr> <th>REV. NO.</th> <th>DESCRIPTION</th> <th>AUTHOR</th> <th>PAGE</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>ORIGINAL ISSUE</td> <td>M/SK 6/10/83</td> <td>1-11</td> </tr> </tbody> </table>								REV. NO.	DESCRIPTION	AUTHOR	PAGE	0	ORIGINAL ISSUE	M/SK 6/10/83	1-11
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## WESTINGHOUSE NUCLEAR TECHNOLOGY DIVISION

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S.O. <b></b>	CALC. NO. <b>CAE-05-01</b>	FILE NO. <b></b>	GROUP <b>EGT</b>		

**1.0 INTRODUCTION**

THIS REPORT SUMMARIZES ALL PUMP AND VALVE OPERABILITY QUALIFICATION PERFORMED UNDER THE STANDARD WESTINGHOUSE PUMP AND VALVE OPERABILITY PROGRAM THAT IS APPLICABLE TO THE CAE/CBE PROJECTS.

REG GUIDE 1.48, "DESIGN LIMITS AND LOADING COMBINATION FOR SEISMIC CATEGORY I FLUID SYSTEM COMPONENTS" REQUIRES THAT ASSURANCE OF OPERABILITY BE ILLUSTRATED FOR PUMPS AND VALVES WHEN SUBJECTED TO FAULTED CONDITION LOADINGS. WESTINGHOUSE HAS CHOSEN TO ADDRESS THE REQUIREMENT BY USING A COMBINATION OF TESTING AND ANALYSIS TO SHOW THAT DEFORMATIONS RESULTING FROM THE FAULTED CONDITION EVENT DO NOT PRECLUDE OPERABILITY.

DETAILS OF SPECIFIC TEST AND ANALYSIS PERFORMED FOR BOTH PUMPS AND VALVES ARE EXPLAINED IN DETAIL IN SECTION 3.9.3.2 OF THE BYRON/BRAIDWOOD FINAL SAFETY ANALYSIS REPORT (FSAR). THE INTENT OF THIS SUMMARY IS TO PROVIDE A REFERENCE TO THOSE QUALIFICATION REPORTS AND DOCUMENTS APPLICABLE TO THE CAE/CBE PROJECTS.

THE REPORT IS APPLICABLE ONLY TO THOSE PUMP AND VALVES RECOGNIZED AS BEING ACTIVE.

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## 2.0 SUMMARY

A LIST OF ACTIVE VALVES AND THEIR RESPECTIVE OPERABILITY QUALIFICATION REPORTS/DOCUMENTATION ARE IN TABLE 2.1. STATIC DEFLECTION TESTS WERE PERFORMED AS PART OF THE VALVE QUALIFICATION. NOT EVERY VALVE ID WAS TESTED. THOSE VALVES TESTED WERE CHOSEN AS BEING REPRESENTATIVE OF A FAMILY OF VALVES. TABLE 2.1 INDICATES WHICH TESTED VALVE COVERS EACH SPECIFIC ID. BECAUSE OF THEIR LOW PROFILE, STATIC DEFLECTION TESTING IS NOT PERFORMED ON ACTIVE CHECK VALVES.

THE ACTIVE PUMPS AND THEIR RESPECTIVE SEISMIC QUALIFICATION REPORTS/DOCUMENTATION ARE LISTED IN TABLE 2.2.

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CAE/CRE		MARK KAMENIC 6/9/83		J.M.S. 6-10-83				
CALC NO.		FILE NO.		GROUP				
CAE-03-01				EQT				
SYSTEM	LOCATION	W. IL	SERIAL PART NO.	CIRCUIT DESCRIPTION TEST POINT	INJECTION TEST REPORT NO.	MEASUREMENT NO.		
RCS	801	3/4M78FNL	7310-95280	3/4M78FNL	A.1.338	E-167229		
	802A	3/4M78FNL	1163	4DA9ZE	W-210	SD-C-100598		
CVCS	802B	3/4M78FNL	4991	4M78FNL	4995	SD-C-102464		
	803	4M78FNL	DE-1028	12M78FNL	4995	115E426		
	LCV 112B,C	8M78FNL	4991	2TM78FNL	4995	115E431		
	LCV 112D,E	2TM78FNL	DE-1028	4M78FNL	4995	E73-020-R		
	8100	2TM78FNL	4991	2TM78FNL	4995	115E422		
	8104	2TM78FNL	DE-1028	4M78FNL	4995	E73-020-R		
	8105	2TM78FNL	4991	2TM78FNL	4995	115E422		
	8106	2TM78FNL	DE-1028	4M78FNL	4995	E73-020-R		
	8110	2TM78FNL	4991	2TM78FNL	4995	E73-020-R		
	8111	2TM78FNL	DE-1028	4M78FNL	4995	D-166026		
SIS	8112	2TM78FNL	7310-95280	31A76FE	4.4.496	E73-020-R		
	8152	31A76FE	DE-1028	2TM78FNL	4995	E73-020-R		
	8160	2TM78FNL	4991	4M78FNL	4995	115E425		
	8555A,B,C,D	2TM78FNL	DE-1028	4M78FNL	4995	115E433		
	8901A,B	4M78FNL	4991	4M78FNL	4995	116E440		
	8902A,B	4M78FNL	DE-1028	12M78FNL	4995	115E432		
	8904A,B	4M78FNL	4991	4M78FNL	4995	115E430		
	8906	4M78FNL	DE-1028	4M78FNL	4995	1162E46		
	8907A,B	4M78FNL	4991	4M78FNL	4995	115E428		
	8908A,B,C,D	4M78FNL	DE-1028	4M78FNL	4995			

# WESTINGHOUSE NUCLEAR TECHNOLOGY DIVISION

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<p>TABLE 2.1</p> <table border="1"> <thead> <tr> <th>SYSTEM</th> <th>LOCATION</th> <th>WTD</th> <th>SEISMIC REACTOR NO.</th> <th>STATIC DEFLECTION TEST (INCHES)</th> <th>DEFLECTION TEST RESULTS NO.</th> <th>WORKING NO.</th> </tr> </thead> <tbody> <tr> <td rowspan="10">SIS</td> <td>8812A,B</td> <td>12GM78FE</td> <td>4981</td> <td>12GM78B</td> <td>4995</td> <td>115E438</td> </tr> <tr> <td>8813</td> <td>21M78FN</td> <td>DE-1028</td> <td>21M78FN</td> <td>SR-697</td> <td>E73-022-R</td> </tr> <tr> <td>8814</td> <td>1/2 21M78FN</td> <td>4981</td> <td>4GM78B</td> <td>4975</td> <td>E73-028-R</td> </tr> <tr> <td>8821A,B</td> <td>4GM78FN</td> <td>4981</td> <td>4GM78B</td> <td>4975</td> <td>115E424</td> </tr> <tr> <td>8835</td> <td>4GM78FN</td> <td>4981</td> <td>4GM78B</td> <td>4975</td> <td>115E425</td> </tr> <tr> <td>8840</td> <td>12GM78FN</td> <td>7310-45280</td> <td>11A78CE</td> <td>4.4.496</td> <td>115E436</td> </tr> <tr> <td>8843</td> <td>3/4 11A78LE</td> <td>7310-45280</td> <td>11A78CE</td> <td>4.4.496</td> <td>D-165976</td> </tr> <tr> <td>8871</td> <td>11A78BES</td> <td>4981</td> <td>21M78FN</td> <td>4995</td> <td>D-166121</td> </tr> <tr> <td>8880</td> <td>3/4 11A78BE</td> <td>DE-1028</td> <td>21M78FN</td> <td>4995</td> <td>D-165993</td> </tr> <tr> <td>8888</td> <td>1/2 21M78FN</td> <td>4981</td> <td>4GM78B</td> <td>4995</td> <td>D-166121</td> </tr> <tr> <td rowspan="10">WPS</td> <td>8892A,B</td> <td>6GM72FB</td> <td>7310-45280</td> <td>11A78CE</td> <td>4.4.496</td> <td>E73-018-R</td> </tr> <tr> <td>8892A</td> <td>3/4 11A78BE</td> <td>4981</td> <td>4GM78B</td> <td>4995</td> <td>115E430</td> </tr> <tr> <td>8916A</td> <td>31M78FE</td> <td>1163</td> <td>11A78CE</td> <td>4.4.496</td> <td>D-166121</td> </tr> <tr> <td>LCV 1003</td> <td>31M78FE</td> <td>1163</td> <td>4DA92R</td> <td>W-210</td> <td>SD-C-108252</td> </tr> <tr> <td>9157</td> <td>11M78FE</td> <td>1163</td> <td>2DA92R</td> <td>4995</td> <td>SD-C-102872</td> </tr> <tr> <td>9159A,B</td> <td>3/4 11M78FE</td> <td>1163</td> <td>41A92R</td> <td>4995</td> <td>SD-C-102864</td> </tr> <tr> <td>9160A,B</td> <td>11M78FE</td> <td>1163</td> <td>41A92R</td> <td>4995</td> <td>SD-C-102872</td> </tr> <tr> <td>9170</td> <td>31M78FE</td> <td>1163</td> <td>4GM78B</td> <td>4995</td> <td>SD-C-104252</td> </tr> <tr> <td>FCV 610</td> <td>3GM78FN</td> <td>4981</td> <td>4GM78B</td> <td>4995</td> <td>115E422</td> </tr> <tr> <td>FCV 611</td> <td>12GM78FEH</td> <td>4981</td> <td>12GM78B</td> <td>4995</td> <td>115E424</td> </tr> <tr> <td rowspan="2">RHR</td> <td>8701A,B</td> <td>12GM78FEH</td> <td>4981</td> <td>12GM78B</td> <td>4995</td> <td>115E424</td> </tr> <tr> <td>9172A,B</td> <td>12GM78FEH</td> <td>4981</td> <td>12GM78B</td> <td>4995</td> <td>115E424</td> </tr> </tbody> </table>									SYSTEM	LOCATION	WTD	SEISMIC REACTOR NO.	STATIC DEFLECTION TEST (INCHES)	DEFLECTION TEST RESULTS NO.	WORKING NO.	SIS	8812A,B	12GM78FE	4981	12GM78B	4995	115E438	8813	21M78FN	DE-1028	21M78FN	SR-697	E73-022-R	8814	1/2 21M78FN	4981	4GM78B	4975	E73-028-R	8821A,B	4GM78FN	4981	4GM78B	4975	115E424	8835	4GM78FN	4981	4GM78B	4975	115E425	8840	12GM78FN	7310-45280	11A78CE	4.4.496	115E436	8843	3/4 11A78LE	7310-45280	11A78CE	4.4.496	D-165976	8871	11A78BES	4981	21M78FN	4995	D-166121	8880	3/4 11A78BE	DE-1028	21M78FN	4995	D-165993	8888	1/2 21M78FN	4981	4GM78B	4995	D-166121	WPS	8892A,B	6GM72FB	7310-45280	11A78CE	4.4.496	E73-018-R	8892A	3/4 11A78BE	4981	4GM78B	4995	115E430	8916A	31M78FE	1163	11A78CE	4.4.496	D-166121	LCV 1003	31M78FE	1163	4DA92R	W-210	SD-C-108252	9157	11M78FE	1163	2DA92R	4995	SD-C-102872	9159A,B	3/4 11M78FE	1163	41A92R	4995	SD-C-102864	9160A,B	11M78FE	1163	41A92R	4995	SD-C-102872	9170	31M78FE	1163	4GM78B	4995	SD-C-104252	FCV 610	3GM78FN	4981	4GM78B	4995	115E422	FCV 611	12GM78FEH	4981	12GM78B	4995	115E424	RHR	8701A,B	12GM78FEH	4981	12GM78B	4995	115E424	9172A,B	12GM78FEH	4981	12GM78B	4995	115E424
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PROJECT <b>CAE/CBE</b>		AUTHOR <b>NADK KAMENIC 6/9/82</b>		DATE CHK'D BY <b>J.M.S 6/10/82</b>		DATE CHK'D BY		DATE
S.O.		CALC NO <b>CAE-QE-01</b>		FILE NO		GROUP <b>BGT</b>		

SYSTEM	LOCATION	WID	SEISMIC REPORT NO.	SEISMIC DEFLECTION TEST NO.	CYCLIC DEFLECTION TEST NO.	DEFLECTION TEST NO.	DRAWING NO.
EWC CCWS SE FW CNC	8716A,B	86N7FE	4981	126M8B	4945	15E623	
	9437A,B	31N6ZRG	7310-9528D	31A99RG	4.4.496	D-16544	
	9354 A,B	36N19RL	7310-9530	36N19RL	4.1.338	E-167329	
	9355A,B						
	9356A,B						
	9357A,B						
	510	16FA37RG	FOR-15-2	16FA37R	FOR-15-2	54A75AB	
	520						
	530						
	540						
CNC	510A	4FA37RG	FOR-15-1	4FA37RG	FOR-15-1	54A75AB	
	520A						
	530A						
	540A						
	8473	2C5B	KAR-2C		N/A	W-D-9911-(3)	
	8487						
	8112	34C7B	KAR-1C			W-D-9916-(2)	
	8248	2C7B	KAR-2C			W-D-9911-(2)	
	8267A,B,C,D	2C6B				W-D-9911-(1)	
	8368A,B,C,D	2C1B				W-D-9911-(2)	
8372A,B,C,D	2C8B				W-D-9911-(1)		
8377	2C9B						
8379A,B	2C5B					934D20Z	

TABLE 2.1							TITLE	
							2400 CYCL AND VALVE OPERABILITY SUMMARY	
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# WESTINGHOUSE NUCLEAR TECHNOLOGY DIVISION

TITLE <b>BEED PUMP AND VALVE OPERABILITY SUMMARY</b>						PAGE <b>10 OF 11</b>	
PROJECT <b>CAE/CBE</b>		AUTHOR <b>MARK KAMENIC</b>		DATE <b>6/9/83</b>		CHK'D BY <b>J.M.S. 6/10/83</b>	
S.O.		CALC. NO. <b>CAE-CE-01</b>		FILE NO.		GROUP <b>EST</b>	

TABLE 2.1

SYSTEM	LOCATION	VALVE	SEISMIC REPORT NO.	STATIC EXHAUSTION TEST CONDUCTED BY	INSTRUMENT REPORT NO.	TRAINING NO.
SIS	8140 A,B	1C73	KEAR-00779- C-10Y REL.1	U/A	U/A	U-D-9913-(2)
	8143 A,B,C,D	10C88	406B REL.1	→	→	934DZ07
	8149 A,B,C,D	6C88				506DES
	8430 A,B,C,D	10C88				924DZ07
	8758 A,B	12C74				934U197
	8968	1C66	KEAR-00779- C-10Y REL.1			U-D-9914X01-(2)

REV. NO.	REV. DATE	AUTHOR	DATE	CHK'D BY	DATE	CHK'D BY	DATE
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# WESTINGHOUSE NUCLEAR TECHNOLOGY DIVISION

TITLE <b>BIBBY PUMP AND VALVE OPERABILITY SUMMARY</b>							PAGE <b>11</b> OF <b>11</b>	
PROJECT <b>CAE/CBE</b>		AUTHOR <b>NAGL KAMENIC 6/9/83</b>		DATE <b>6-10-83</b>		CHK'D. BY <b>J.M.S.</b>		DATE
S.O.		CALC NO. <b>CAE-DC-01</b>		FILE NO.		GROUP <b>EGT</b>		

TABLE 2.2	SYSTEM	SPIN	DESCRIPTION	MOTOR ELECTRIC EQUIP	PUMP ELECTRIC EQUIP	DRAWING
	CVCS	APCH01	CVCS CHARGING PUMPS	75-F-32351	K-213-1 REV 4	370-B49224
		APCH02				
	CVCS	APRA01	BORIC ACID TRANSFER PUMPS	82-D-55567	ME-225	N717682 #1
		APRA02				
	SA	APEI01	SAFETY INJ. PUMPS	74-F-32374	K-2102 + K-2106 REV 3	
		APEI02				
	COWS	APCC01	COMPONENT COOLING WATER PUMPS	74-F-47535	ME-210	N233595 #1
		APCC02				
	RHE	APCC03				
APCC04						
RHE	APEH01	RHE PUMPS	74-F-12691	ME-174	C-8820WDF 86 X 112	
	APEH02					
SFC	APSF01	SPENT FUEL PUMP		LATER	N233596 #1	
	APSF02					

REV NO	REV DATE	AUTHOR	DATE	CHK'D. BY	DATE	CHK'D. BY	DATE
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PVORT Draft SER  
Generic Item 3

Aging considerations have been incorporated into the qualification program for Class 1E electrical equipment and instrumentation in plant harsh environment areas. Qualification testing complies with the sequential testing requirements of IEEE-323-1974. The description of this program has been supplied to the NRC. Evidence showing compliance with the sequential test requirements has been provided during the EQ audit.

A separate program for the environmental qualification of mechanical equipment has not been required by Byron. However, Commonwealth Edison has developed a program to insure that aging of mechanical components will not adversely affect the availability of safety related mechanical equipment. This program incorporates maintenance and surveillance and is further discussed in SQRT Generic Item #6.



PVORT Draft SER  
Generic Item 4

At this time, over 90% of the system pre-operational test procedures have been written and approved for testing at Byron. All active pumps are included in the pre-operational test program and the Preservice Testing Program Plan for Pumps. Parameters measured include inlet pressure, differential pressure, flowrate, vibration, lubrication level, and bearing temperature where appropriate. Pump performance is evaluated against test acceptance criteria developed from system Design Criteria and FSAR Safety Limits. The pre-operational tests and the Preservice Testing Program will demonstrate that the active pumps will function as installed and perform their required safety function within the overall system design.

Virtually all active valves are stroked to demonstrate their operability during system pre-operational testing and in the Preservice Testing Program Plan for Valves. Tests on valves include seat leakage tests, full stroke tests, check valve exercise tests, relief valve setpoint checks, fail safe tests, position indication checks, and part stroke tests. In addition, valves are timed where required, to verify movement to their safe position within prescribed time limits.

Beyond system pre-operational testing and preservice testing of pumps and valves, inservice testing of pumps and valves as required by ASME Section XI is performed on a periodic basis to demonstrate the continued operability of active pumps and valves. A complete description of the Preservice/Inservice Testing Program Plan for Pumps and Valves is included in the November 4, 1982 letter from T.R. Tramm to H.R. Denton.

PVORT Draft SER  
Generic Item 5

Commonwealth Edison record keeping systems are maintained in accordance with 10CFR50 Appendix B. A filing system has been established to enable station personnel to retrieve qualification documentation when needed.

For Non-NSSS equipment, engineering documentation (seismic qualification reports, etc.) is transferred from Sargent & Lundy files to the station. The qualification documentation is organized by Sargent & Lundy procurement specification number and is filed accordingly by the central files office of the station. Documentation is retrievable by the S&L procurement specification number and the equipment piece number. The subject documentation is currently being transferred to the station.

With regard to NSSS equipment, qualification documentation is maintained in a central file location by Westinghouse in Pittsburgh. This documentation is retrievable by valve location number for valves, and SPIN and project number for pumps and all other mechanical equipment. Complete qualification documentation for NSSS Class 1E equipment is retrievable by reference to WCAF-8587 and WCAP-8687.

PVORT Draft SER  
Generic Item 6

Pump and Valve Operability Assurance Program

As described in Section 3.9.3.2 of the Byron/Braidwood FSAR, an operability assurance program has been established to assure active pumps and valves will perform their intended safety function during the life of the plant under postulated plant conditions. Active mechanical equipment is that Seismic Category I equipment which must perform a mechanical motion during the course of shutting down the plant or mitigating the consequences of an accident. Active pumps and valves are listed in Tables 3.9-15 and 3.9-16 of the FSAR, respectively.

Testing, analysis, a combination of testing and analysis, or previous operating history are acceptable design methods for assuring operability of components for all expected combinations of loadings. Vendor in-shop tests or analyses, pre-operational tests, hot functional tests, static deflection tests, and periodic inservice surveillance form the basis for this program. In the case of vendor in-shop tests or analyses, acceptance criteria for operability are provided in the component procurement specification. The procurement specification specifies seismic qualification criteria, pipe reaction end loads (including weight, thermal and seismic loads), environmental conditions, design transients, system operation requirements, special test requirements, and other considerations which are important in the overall design of the components. Stress limits are listed in FSAR Table 3.9-10 for active valves and Table 3.9-8 for active pumps. The note for these tables reads "The stress limits specified for active pumps (and valves) are more restrictive than ASME III limits to provide assurance that operability will not be impaired for any operating condition."

Verification that the vendor has complied with all design requirements set forth in the component procurement specification assures operability of the component for its intended safety function. Conformance to current seismic qualification and environmental qualification parameters is verified by independent programs.

The philosophy employed by CECO reflects that of Paragraph 1.a.(10) of Standard Review Plan 3.10, Revision 2. This paragraph states that if dynamic testing of a pump or valve assembly proves to be impractical, static testing of the assembly is acceptable provided nozzle loads and dynamic amplification effects are addressed and the component is operated during and after the applied loads. For large size and high pressure valves it is often impractical, if not impossible, to perform dynamic, full flow testing. Test facilities do not have adequate capacities for the large, high pressure valves. For those valves for which dynamic full flow testing is possible, the additional benefits gained over static testing do not justify the cost.

Byron/Braidwood Station personnel will develop and implement preoperational and hot functional test procedures prior to plant operation. Inservice Surveillance conforming to ASME Code, Section XI requirements will be conducted periodically to assess operational readiness of pumps and valves during their service life.

PVORT Draft SER  
Generic Item 6

All vendors supplying active components maintain an approved Quality Assurance Program commensurate with the requirements set forth in 10CFR50, Appendix B. The vendor's Quality Assurance Program provides for effective implementation of procedures, instructions, or reviews to ensure that all testing and analyses are accomplished in compliance with the specification and applicable codes and standards.

Pump Operability

Active pumps are qualified for operability by first being subjected to vendor in-shop tests as required by the component procurement specification.

The in-shop mechanical tests include hydrostatic tests of pressure retaining parts and pump performance tests. Hydrostatic test procedures and reports conform to ASME Code Section III requirements. Performance tests are completed in accordance with Hydraulic Institute Standards. Generally, the pumps are run at design flow and head, shutoff head, 120% of design flow, and two intermediate points to verify performance characteristics. NPSH requirements are determined by test for each pump from 0 to 120% of design flow. Verification that running clearances are adequate and that vibration and noise levels are within acceptable limits is recorded during performance tests.

All Class 1E equipment associated with active pumps meet the qualification requirements of IEEE 323-1974.

Valve Operability

Active valves are qualified for operability by first being subjected to vendor in-shop tests as required by the component procurement specification and then in many cases through static deflection tests. The in-shop mechanical tests include shell hydrostatic or pneumatic tests to ASME Code Section III requirements, backseat and main seat leakage tests, disc hydrostatic tests, and functional tests to verify that the valve will open and close within the specified time limits when subjected to the design differential pressure. Where functional tests to verify opening and closing capabilities are not practical, analysis is used to assure operability. Where required, impact testing is performed in accordance with ASME Code Section III. The static deflection test that is performed involves applying a load or loads equivalent to the resultant of the three-dimensional SSE accelerations to the center of gravity of the assembly extended structure. While in the deflection position, the valves are cycled to show that any internal rubbing or bending will not occur to the point that the valve is not able to respond upon demand and open or close within the specified time. As before, during in-shop mechanical tests, the maximum differential pressure to which the valve is designed is applied.



PVORT Draft SER  
Generic Item 6

Valve Operability (Continued)

In developing the methodology for performing static deflection tests, the need to apply nozzle loads was evaluated and determined not to be necessary. The basis for excluding nozzle loads is that the valve body is designed to requirements which are more conservative than requirements for attached piping. This would result in yielding of the pipe rather than the valve. Also assurance that deformation due to nozzle loads will not occur is gained by specifying maximum nozzle loads to the piping designer.

The static deflection testing performed under the operability assurance program is in many ways more severe than the dynamic testing addressed by SRP 3.10. Since the static load is applied at or above the extended structure center of gravity, the resulting loads, moments, and deflections are greater than if the loading was distributed. This static testing causes deflections and any associated internal rubbing to be continuous as opposed to intermittent deflections that would result from dynamic testing. At no point is there any relaxation that would aid operability.

For valves designed to be rigid, dynamic amplification effects do not affect the loads applied to the valve during the static deflection test or the qualification acceleration level. In those cases where valves are not rigid, dynamic amplification effects are taken into account in calculating the loads to be used in the static deflection test and the qualification acceleration level for the valve. A further discussion of loads and accelerations used in the static deflection tests is provided in FSAR Section 3.9.3.2.

Active valves are seismically qualified by tests or analyses per the requirements of IEEE 344-1975. All Class 1E equipment associated with active valves meets the sequential testing requirement of IEEE 323-1974. For motor operated valves, analyses are performed to verify compatibility of operator torque output versus valve torque requirements.

In summary, in-shop mechanical, cold hydro and hot functional tests assure that pumps and valves will operate under normal conditions. The static deflection tests and combination of test and analysis assure that active pumps and valves will operate under all intended service conditions.

# SARGENT & LUNDY

## INTER-OFFICE MEMORANDUM

005567

From T. R. Eisenbart - 24, x2172 DRE Date December 27, 1982  
Dept./Div. Electrical/Project Engineering Project No. 4391/2 & 4683/4  
Spec. No. F/L-2819  
File No. 4391/25C  
Page No. 1 of 1

Client Commonwealth Edison Co. Stn Byron/Braidwood Unit 1 & 2

Subject Qualification Documentation for Station Batteries

To: K. Adlon - 30

Attached find the Qualification Documentation submitted by Gould Incorporated for the 125VDC Station Batteries supplied for Byron/Braidwood.

(Spec. F/L-2819)

TRE:sh

20-10-15  
Filer

Gould Inc., Industrial Battery Division  
2050 Cabot Boulevard West, Langhorne, Pa. 19047  
Telephone (215) 752-0555



CABLE: GOULNATBAT LANGHORNE, PA.  
TWX: GOULD LAHN 510-667-2056  
GOULD LANG 510-667-2066

December 14, 1982

Sargent and Lundy Engineers  
55 East Monroe Street  
Chicago, IL 60603

Attn: ~~T. Eisenhart~~  
~~J. E. Howbray~~

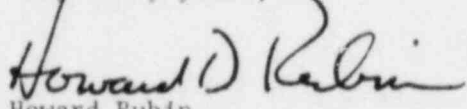
Re: Byron/Braidwood  
Sargent and Lundy Spec. No. Y-2819  
Commonwealth Edison P.O. No. 194757, 758  
GNB Batteries Inc./Gould S.O. KE 5145, 5147, 5149, 5186

Subject: Environmental Qualification Report (EQR)  
Lead Acid Storage Batteries  
IEEE 344/323/535

Dear Mr. ~~Eisenhart~~  
~~Howbray~~

Enclosed please find one (1) copy of our EQR and one (1) copy of Wyle Laboratories' Test Report, Volumes I and II to support the qualification of our NCX Batteries for the Byron/Braidwood Stations. Additional copies will be made available upon notice of approval.

Very truly yours,

  
Howard Rubin  
Product Manager  
Utility Batteries and Chargers

HR:dh

cc: Mr. J. Murray - BBEL EO#5413

Project File Index No. 32-005567

## INTER-OFFICE MEMORANDUM

COD FILE 005567

From G. K. Roy - 30 - X2713 Date January 20, 1983  
Project No. 4391,2/4683,4-00  
Dept./Div. Mechanical/Component Qualification Spec. No. F/L-2819  
File No. CQD-005567  
Page No. 1 of 1

Client CECO Stn. Byron/Braidwood Unit 1&2

Subject Review of Seismic Report for Storage Battery & Battery  
Racks (1&2DC01EA,EB; 1&2DC02EA,EB)

To: J. S. Paniaguas - 30  
CC: W. C. Cleff - 22  
K. L. Adlon - 30  
T. Eisenbart - 24  
AEM/APD/RDR/GKR - 30  
CQD File - 30

This file has been microfilmed &  
returned to the Project Engineer.

*Safety Related / send to Q.A.*

- References: 1) Gould Inc. Seismic Report on Storage Battery,  
Report No. GB-3454, Rev. #11-Z, dated  
November 19, 1982.
- 2) Seismic Qualification Test Report on Storage Battery  
prepared by Wyle Laboratories, Test Report No.  
44681-2.

The above referenced reports satisfy the seismic requirements outlined in Specification F/L-2819, and have been accepted.

GKR:sas

*G. K. Roy*  
*KLR*



PROJECT NAME: <u>BYRON/BRAIDWOOD</u> <u>122</u>	PROJECT NO.: <u>4391, 2/46B3A</u> <u>-00</u>	FILE NO.: <u>CQD-005567</u> REVISION NO.: <u>00</u>
SPEC. NO.: <u>F/L-2819</u>	Reviewed By: <u>[Signature]</u> Review Approved By: <u>[Signature]</u> (signature)	Date: <u>01-19-83</u>  Date: <u>1-20-83</u>
<input checked="" type="checkbox"/> BOP <input type="checkbox"/> NSSS		
COMPONENT NAME: <u>Storage Battery</u>		
VENDOR/MANUFACTURER: <u>Gould Inc.</u>		
COMPONENT NO./MODEL NO.: <u>1B2DC01EA, EB/1B2DC02 EA, EB</u>		
VENDOR'S REPORT NO. AND DATE: <u>Gould Inc. Report no: GB-3454 dt. 11/19/82</u> <u>Wyle Lab's Report no: 446B1-2</u>		

A. CONCLUSION OF REVIEW

☒ Accepted                      ☐ Rejected

Comments: \_\_\_\_\_

B. CLASSIFICATION AND FUNCTION

1. Classification

- ☒ Nuclear Safety-Related, Active  
☐ Nuclear Safety-Related, Passive  
☐ Non-Nuclear Safety-Related

2. The component function is \_\_\_\_\_

3. Operability Requirements (Active Components Only)

This component is required to operate:

- ☒ During and after postulated dynamic and accident events  
☐ Only after postulated dynamic and accident events

MECHANICAL DEPARTMENT STANDARD

CHECKLIST FOR DYNAMIC QUALIFICATION OF  
MECHANICAL AND ELECTRICAL EQUIPMENT

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Form MAS-CQD-2.4 Approved by [Signature] Dept. Mgr.  
Rev. Orig. (11-11-82)

PROJECT NO.: 4391, 2/4603, 4-00

FILE NO.: CQD- 005567 REV.: 00

C. Location and Mounting1. LocationBuilding: Auxiliary BuildingElevation: 451' - 04"2. Field Mounting Condition☐ Panel/Pipe/HVAC Duct: \_\_\_\_\_☒ ~~Wall~~/Floor☒ Other: Storage Battery mounted on Racks and Racks mounted on floor.3. Mounting Attachment☒ BoltingNumber: 20, Size: 1/2"  $\phi$ Material: A-36 (A-307)☐ Welding

Welding Type: \_\_\_\_\_

Leg: \_\_\_\_\_, Length: \_\_\_\_\_, Pitch: \_\_\_\_\_

☐ Other: \_\_\_\_\_D. METHOD OF QUALIFICATION☒ Static Analysis☒ Test☐ Dynamic Analysis☐ Other: \_\_\_\_\_E. VIBRATION INPUT1. Dynamic Loads Considered☒ Seismic☐ Hydrodynamic☐ Seismic and Hydrodynamic☐ Other: \_\_\_\_\_2. Required Frequency Range: \_\_\_\_\_3. Required Input☐ Response Spectra

a) Required response spectra (attach graphs, identify): \_\_\_\_\_

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Rev. Orig. (11-11-82)

PROJECT NO.: 4391, 2/4683, 4-W

FILE NO.: CQD-005567 REV.: 00

b) Method of combining required response spectra:

- ☐ Absolute Sum  
☐ SRSS  
☐ Not applicable

c) Damping Upset/Service Level B \_\_\_\_\_

Emergency/Service Level C }  
Faulted/Service Level D }

d) Basis for Damping: \_\_\_\_\_

☐ Seismic Coefficients (Required acceleration in each direction)

Upset/Service Level B

 $H_1$  \_\_\_\_\_,  $H_2$  \_\_\_\_\_,  $V$  \_\_\_\_\_

Emergency/Service Level C }  
Faulted/Service Level D }

 $H_1$  \_\_\_\_\_,  $H_2$  \_\_\_\_\_,  $V$  \_\_\_\_\_

4. Is support amplification considered?

☐ Yes ☐ No ☐ Not Applicable

Comments: \_\_\_\_\_

5. Is fatigue considered?

☐ Yes ☐ No ☐ Not applicable

Comments: \_\_\_\_\_

F. QUALIFICATION BY TESTING1. Does the Vendor's report indicate that the component is identical to that to be installed?

- ☐ Yes  
☐ No - justify similarity: \_\_\_\_\_

2. Mounting

a) Mounting Method:

☐ Bolting Number: \_\_\_\_\_, Size: \_\_\_\_\_

Material: \_\_\_\_\_

☐ Welding Welding Type: \_\_\_\_\_

Leg: \_\_\_\_\_, Length: \_\_\_\_\_, Pitch: \_\_\_\_\_

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FILE NO.: CQD-005567 REV.: 00

☐ Other: \_\_\_\_\_

b) Does the Vendor's report indicate that the laboratory mounting simulates the actual service mounting?

☒ Yes☐ No - explain differences: \_\_\_\_\_3. Input Motion☐ Single-Axis☐ Multi-Axis☐ Other: \_\_\_\_\_

Comments: \_\_\_\_\_

4. Test Method☐ Sine dwell (single frequency):

a) Frequency range: \_\_\_\_\_

b) Dwells at: \_\_\_\_\_ (Hz)

c) Number of tests in each orientation:

Upset/Service  
Level BEmergency/Service Level C }  
Faulted / Service Level D }

d) Duration: \_\_\_\_\_

e) Input acceleration in each direction:

Upset/Service Level B

H<sub>1</sub> \_\_\_\_\_, H<sub>2</sub> \_\_\_\_\_, V \_\_\_\_\_Emergency/Service Level C }  
Faulted / Service Level D }H<sub>1</sub> \_\_\_\_\_, H<sub>2</sub> \_\_\_\_\_, V \_\_\_\_\_f) How is cross coupling and modal participation accounted for?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_☐ Sine beat (single frequency):

a) Frequency range: \_\_\_\_\_

b) Number of tests in each orientation:

Upset/Service  
Level BEmergency/Service Level C }  
Faulted / Service Level D }Form MAS-CQD-2.4  
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- c) Number of beats: \_\_\_\_\_, Number of cycles per beat: \_\_\_\_\_
- d) Beats at: \_\_\_\_\_ (Hz)
- e) Input acceleration in each direction:
- |  |   |
|--|---|
| Upset/Service Level B                                      | H <sub>1</sub> _____, H <sub>2</sub> _____, V _____ |
| Emergency/Service Level C }<br>Faulted / Service Level D } | H <sub>1</sub> _____, H <sub>2</sub> _____, V _____ |
- f) How is cross coupling and modal participation accounted for?
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

☒ Random motion (multi frequency):

- a) Frequency range: 1 to 40 Hz
- b) Number of tests in each orientation:
- |                                |  |          |
|--------------------------------|--|----------|
| Upset/Service Level B <u>5</u> | Emergency/Service Level C }<br>Faulted / Service Level D } | <u>1</u> |
|--------------------------------|--|----------|
- c) Duration: 30 Secs.
- d) Does Test Response Spectra (TRS) envelop the Required Response Spectra (RRS)?
- ☒ Yes - Provide RRS and TRS as attachment
- ☐ No - Explain: \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

5. Dynamic Characteristics

- ☒ Natural frequencies: (Racks) H<sub>1</sub> 35.6 Hz, H<sub>2</sub> 35.6 Hz, V 55.12 Hz
- ☐ Natural frequencies not determined.

6. Additional Loads

Are normal operating loads considered?

- ☐ Not applicable
- ☒ Yes
- ☐ No - explain: \_\_\_\_\_
- \_\_\_\_\_

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FILE NO.: CQD- 005567

REV.: 00

7. Monitoring

a) Is the component functionally monitored?

☒ Yes

☐ No

☐ Not applicable

b) Is component's operability verified?

☐ Yes

☐ No

☐ Not applicable

8. Does the test meet the requirements of IEEE 344 19 7 5 ?

☒ Yes

☐ No-explain: \_\_\_\_\_

G. QUALIFICATION BY ANALYSIS

1. Type of Analysis

☒ Static Analysis

☒ Simplified Dynamic Analysis

☐ Modal Analysis

☐ Time History Analysis

☐ Other: \_\_\_\_\_

2. Analytical Model

☐ Finite Element

☐ Other: \_\_\_\_\_

3. Method of Analysis

☐ Computer-Aided Calculation

a) Programs used: \_\_\_\_\_

b) Have the programs been validated?

☐ Yes

☐ No

☒ Hand Calculation

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FILE NO.: CQD- 005567 REV.: 00

4. Operating Loads

Are the operating loads considered in the analysis?

☐ Not applicable☒ Yes☐ No - explain: \_\_\_\_\_5. Static/Simplified Dynamic Analysis

a) Acceleration coefficients:

Upset/Service Level B

 $H_1$  1.75,  $H_2$  1.75,  $V$  3.20Emergency/Service Level C }  
Faulted/Service Level D } $H_1$  2.40,  $H_2$  2.40,  $V$  5.50

b) Are dynamic loads applied in the horizontal and vertical directions simultaneously?

☒ Yes☐ No-explain: \_\_\_\_\_6. Modal Analysis

a) Identify Response Spectra used: \_\_\_\_\_

b) Damping factor used: \_\_\_\_\_

c) Number of significant modes considered: \_\_\_\_\_

d) Natural period/frequency of each: \_\_\_\_\_

e) Method of combining modal responses:

☐ Absolute Sum☐ Square root of sum of the squares (SRSS)☐ In compliance with NRC Regulatory Guide 1.92,  
Rev. \_\_\_\_\_, Date \_\_\_\_\_☐ Other: \_\_\_\_\_Form MAS-CQD-2.4  
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PROJECT NO.: 4391, 2/4683, 4-00

FILE NO.: CQD- 005567 REV.: 00

7. Time History Analysis8. Results

a) Stress evaluation at critical locations:

LOCATION	LOAD COMBINATION	DYNAMIC STRESS	TOTAL STRESS PSI	ALLOWABLE STRESS PSI
Main stringer	Dead load + seismic		23543 (OBE)	23760 (OBE)
Anchor Bolts	D.L + seismic		12,332	20,000

Form MAS-CQD-2.4  
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SENT OUTSIDE OF SARGENT & LUNDY

SARGENT &amp; LUNDY

MAS-CQD-2.4  
Page 8 of 9



PROJECT NO.:

4391, 2/4603, 4-00

FILE NO.: CQD- 005567 REV.: 00

b) Deflection evaluation at critical locations(Active Components only):

LOCATION	CALCULATED DEFLECTION	ALLOWABLE DEFLECTION

H. COMMENTS

Battery was qualified by Test  
and the Battery Racks was qualified  
by Analysis.

Form MAS-CQD-2.4  
Rev. Orig. (11-11-82)FOR OFFICE USE ONLY - NOT TO BE  
SENT OUTSIDE OF SARGENT & LUNDY**SARGENT & LUNDY**MAS-CQD-2.4  
Page 9 of 9

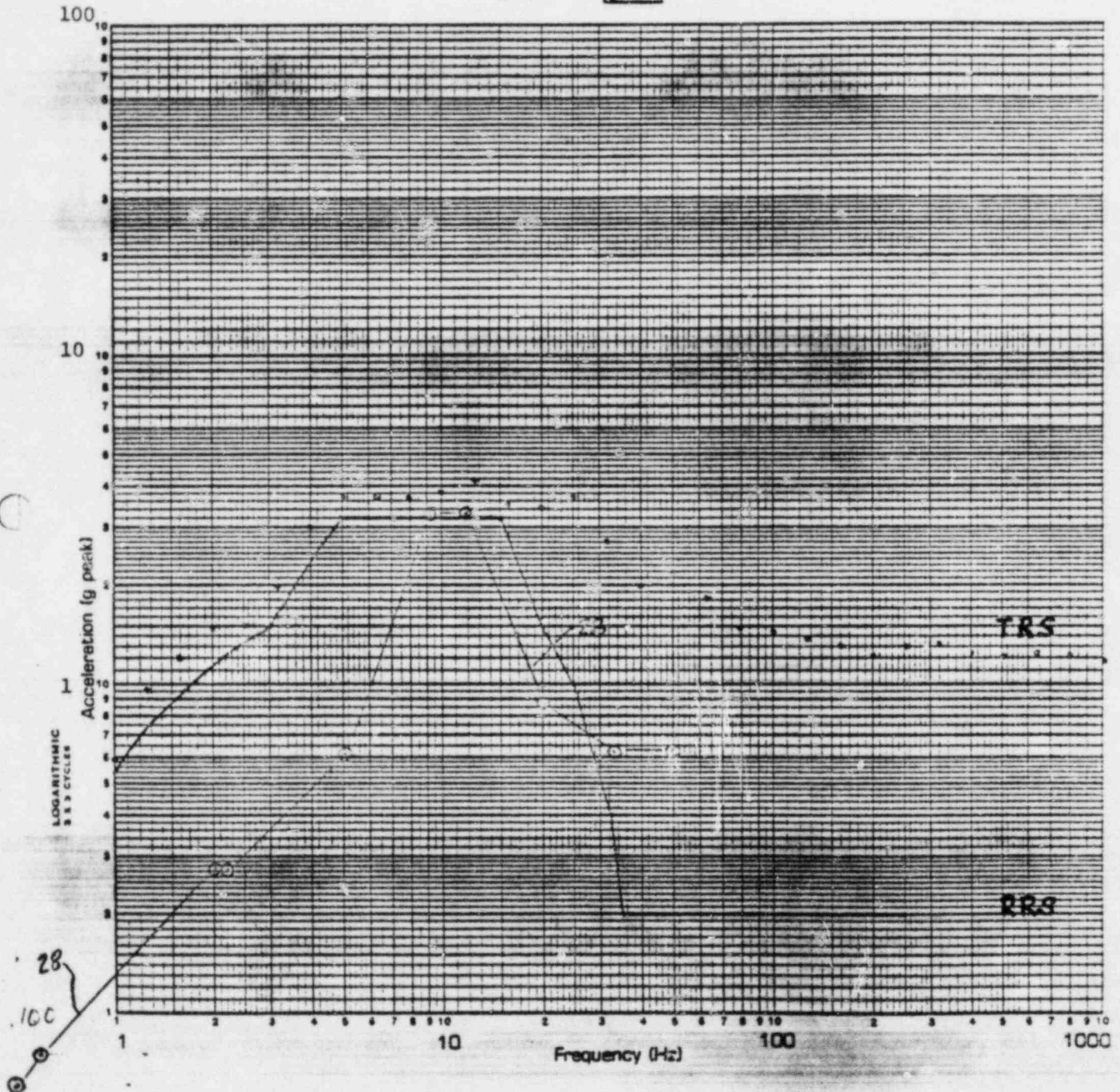
Page No. III-434  
 Report No. 44681-2  
**FULL SCALE SHOCK SPECTRUM (g Peak)**

Legend

• TRS  
 ⊙ Byron/Braidwood RRS  
 Byron/Braidwood Station  
 Commonwealth Edison Co

1.0 □ 10 □ 100 2 1000 □

DAMPING 2%



SPECIMEN \_\_\_\_\_  
 AXIS FR/V

LOCATION NO. VCA Fig. 8.1  
 TEST RUN NO. 8

Comparison of TRS vs RRS Vertical OBE  
 Front-to-Back/Vertical 2% Damping

**CQD FILE 005567**

Page No. III-429  
Report No. 44681-2  
**FULL SCALE SHOCK SPECTRUM (g Peak)**

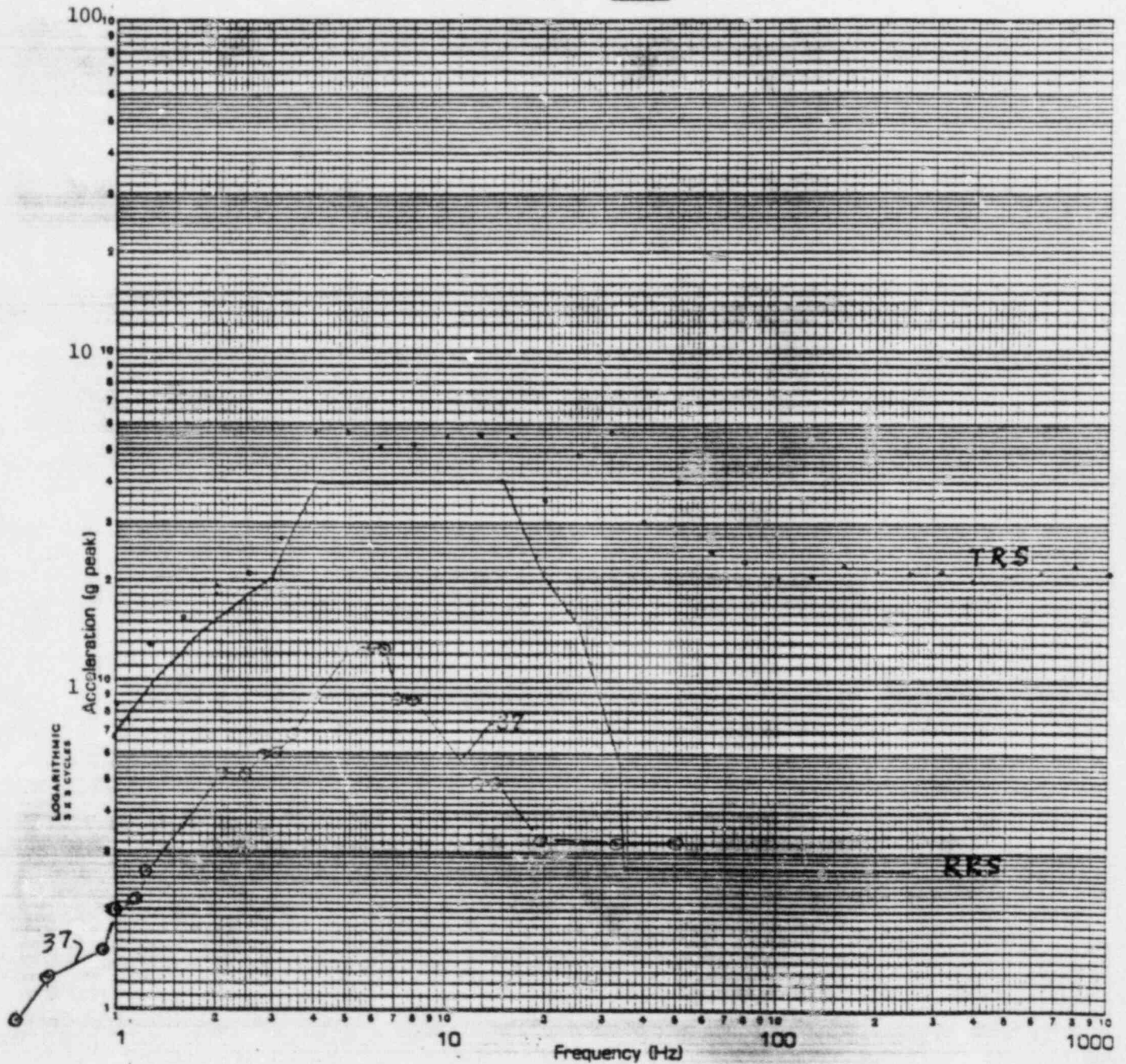
Legend

- TRS
- ⊙ Byron/Braidwood RRS

Byron/Braidwood Station  
Commonwealth Edison Co.

1.0 □ 10 □ 100 ☒ 10000

DAMPING ☒ 2%



SPECIMEN             
AXIS FBV

LOCATION NO. HCA  
TEST RUN NO. 8

Fig. 8.2

Comparison of TRS vs RRS Horizontal OBE  
Front-to-Back/Vertical 2% Damping



Page No. III-458  
 Report No. 44681-2  
**FULL SCALE SHOCK SPECTRUM (g Peak)**

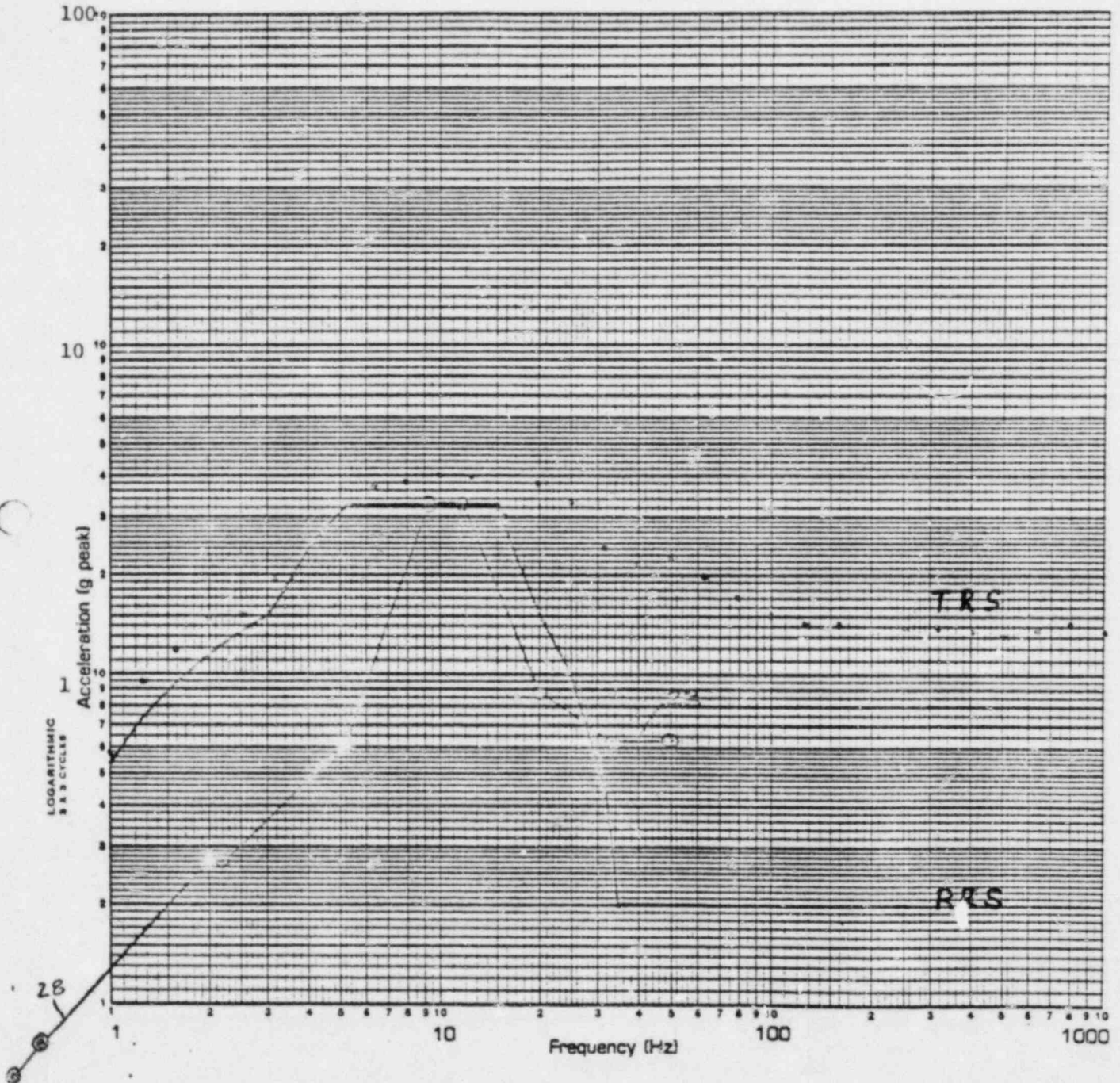
Legend

• TRS  
 © Byron/Braidwood RRS

Byron/Braidwood Station  
 Commonwealth Edison Co.

1.0 ☐ 10 ☐ 100 ☒ 1000 ☐

DAMPING ☒ 2%



SPECIMEN SS/V  
 AXIS SS/V

LOCATION NO. VCA  
 TEST RUN NO. 15

Fig. 8.3

Comparison of TRS vs RRS Vertical OBE  
 Side-to-Side/Vertical 2% Damping

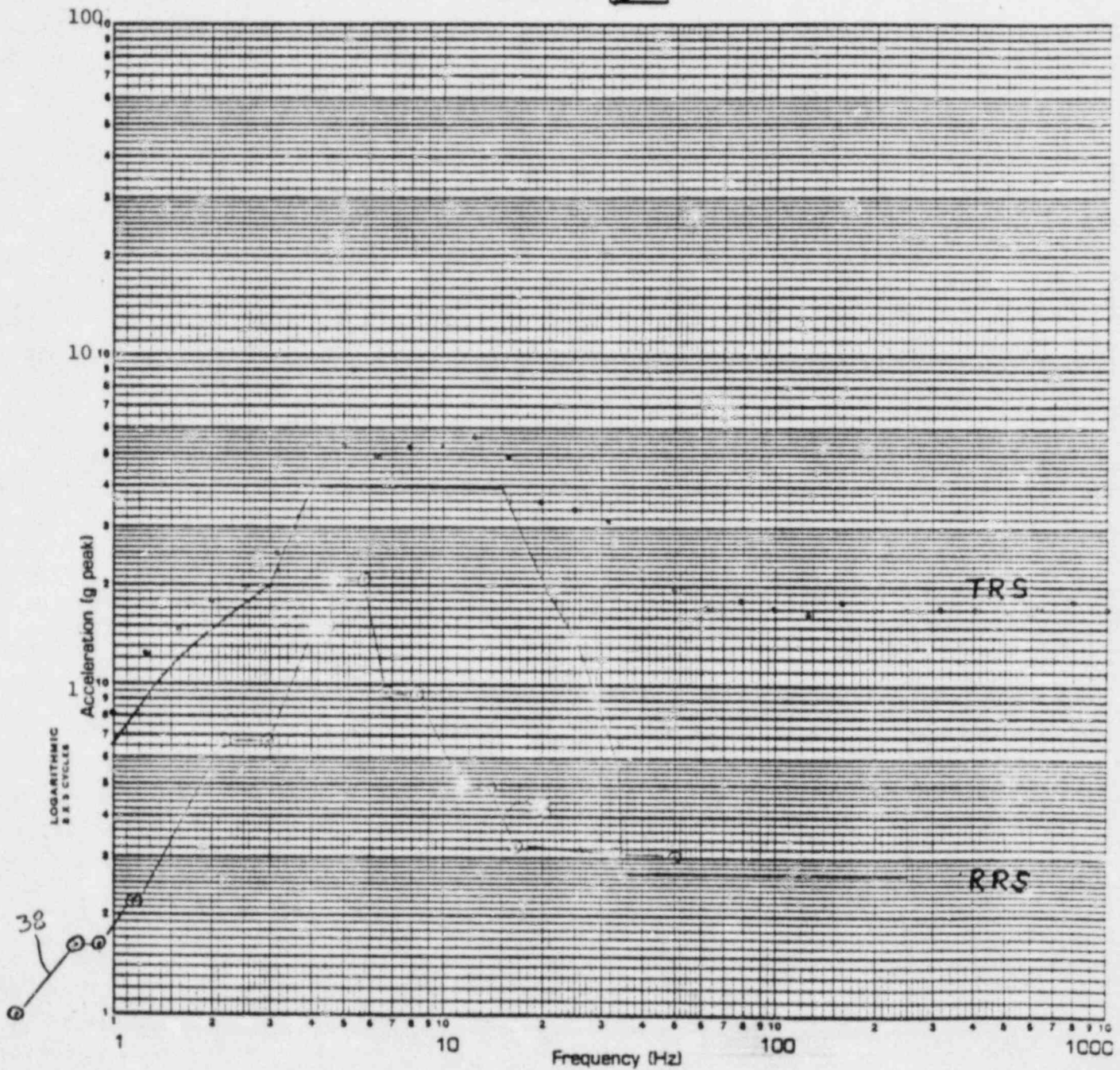
Page No. III-453  
 Report No. 44681-2  
**FULL SCALE SHOCK SPECTRUM (g Peak)**

Legend

- \* TRS
  - ⊙ Byron/Braidwood RRS
- Byron/Braidwood Station  
 Commonwealth Edison Co.

1.0 ☐ 10 ☐ 100 ☒ 1000 ☐

DAMPING ☒ 2%



SPECIMEN SSV  
 AXIS SSV

LOCATION NO. WCA  
 TEST RUN NO. 15

Fig. 8.4

Comparison TRS vs RRS Horizontal OBE  
 Side-to-Side/Vertical 2% Damping

Page No. III-444  
 Report No. 44681-2  
**FULL SCALE SHOCK SPECTRUM (g Peak)**

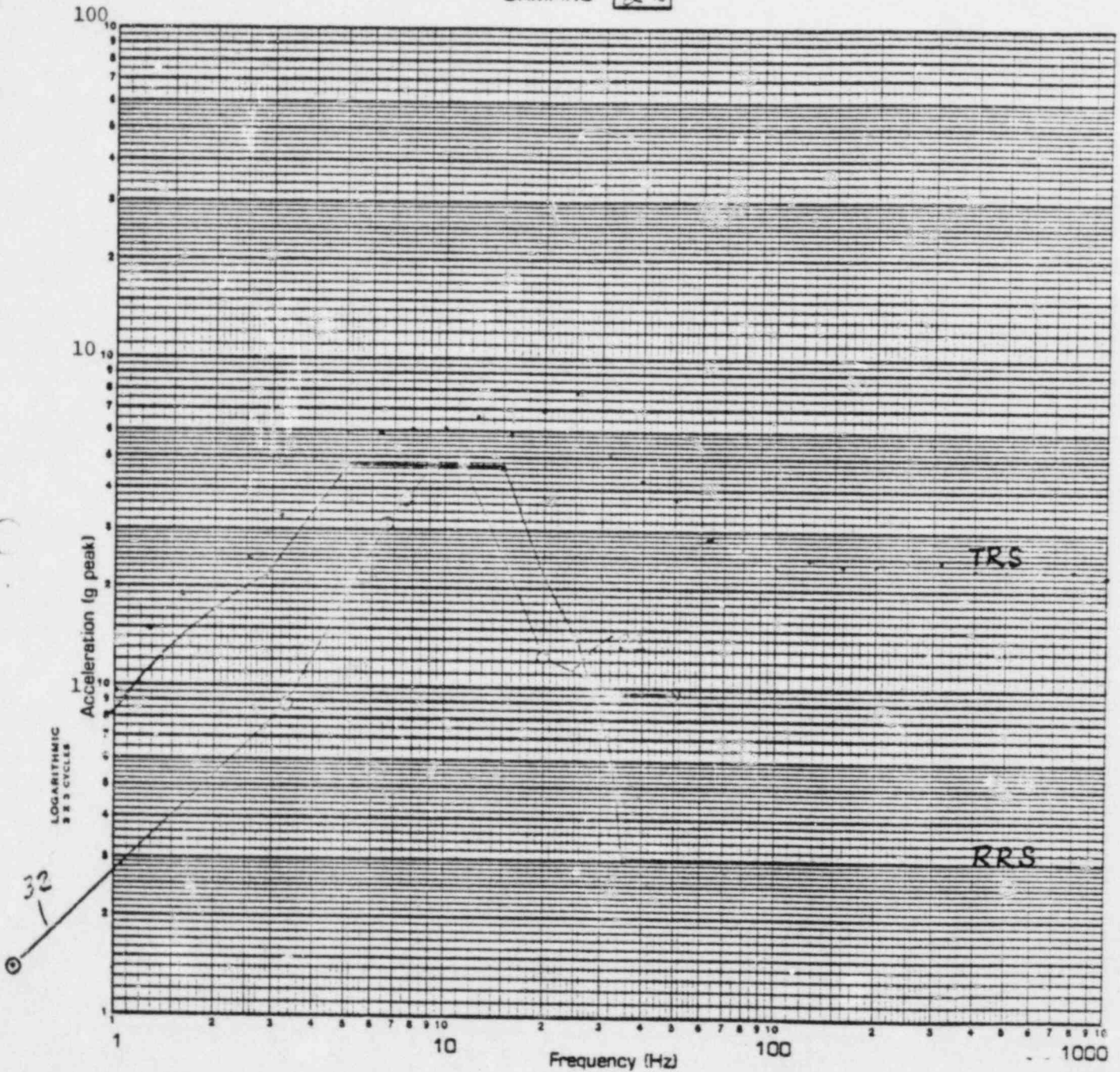
Legend

\* TRS  
 Ⓞ Byron/Braidwood RRS

Byron/Braidwood Station  
 Commonwealth Edison Co.

1.0 ☐ 10 ☐ 100 ☒ 1000 ☐

DAMPING 2%



SPECIMEN           

LOCATION NO. VCA

Fig 8.5

AXIS FB/V

TEST RUN NO. 9

Comparison of TRS vs RRS Vertical DBE (SSE)  
 Front-to Back/Vertical 2% Damping

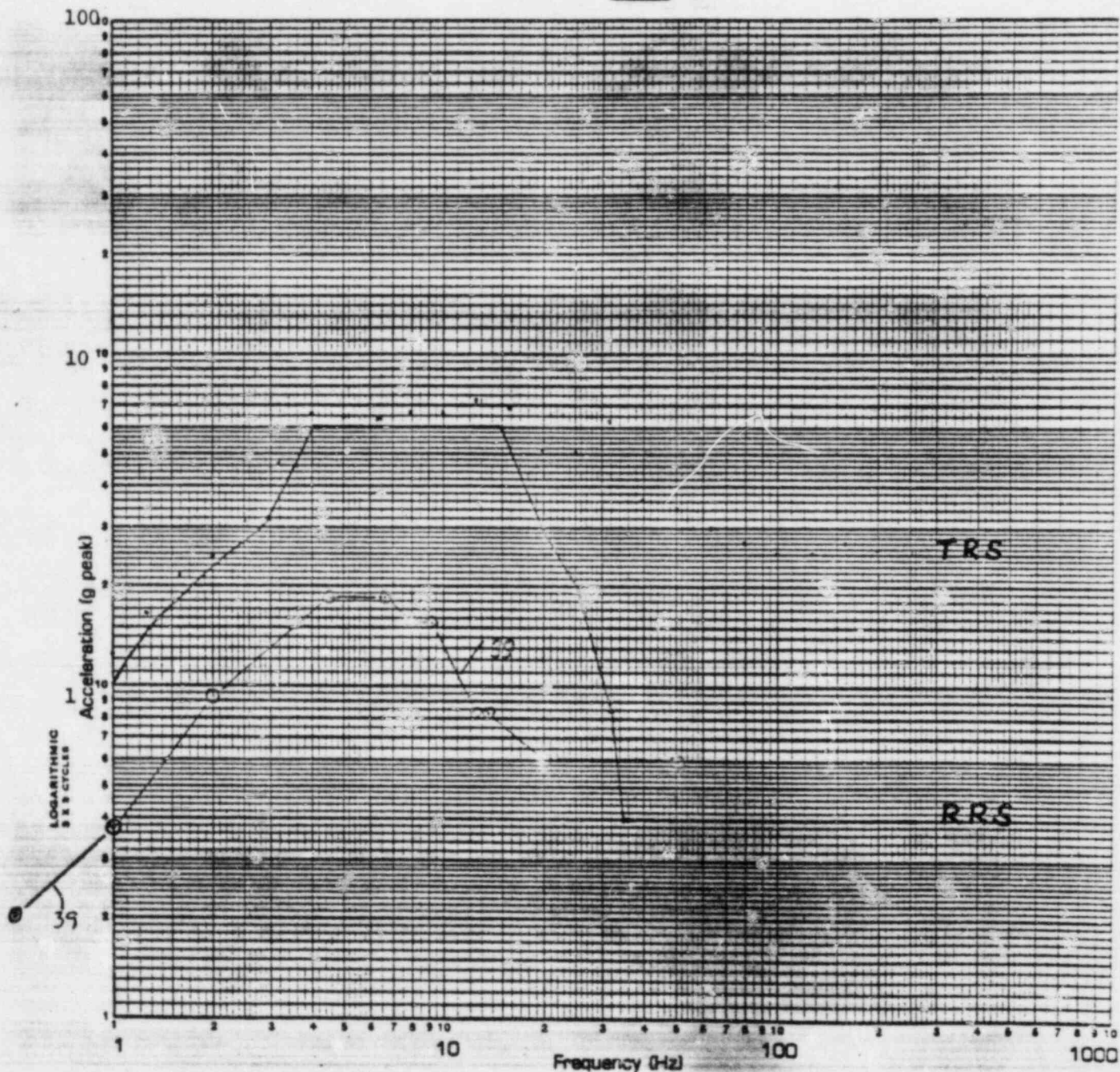


Legend

- TRS
  - ⊙ Byron/Braidwood RRS
- Byron/Braidwood Station  
Commonwealth Edison Co

1.0 □ 10 □ 100 □ 1000 □

DAMPING 2%



SPECIMEN             
AXIS FB/V

LOCATION NO. HCA  
TEST RUN NO. 9

Fig. 8.6

Comparison of TRS vs RRS Horizontal DBE (SSE)  
Front-to-Back/Vertical 2% Damping

Page No. III-468  
Report No. 44681-2  
**FULL SCALE SHOCK SPECTRUM (g Peak)**

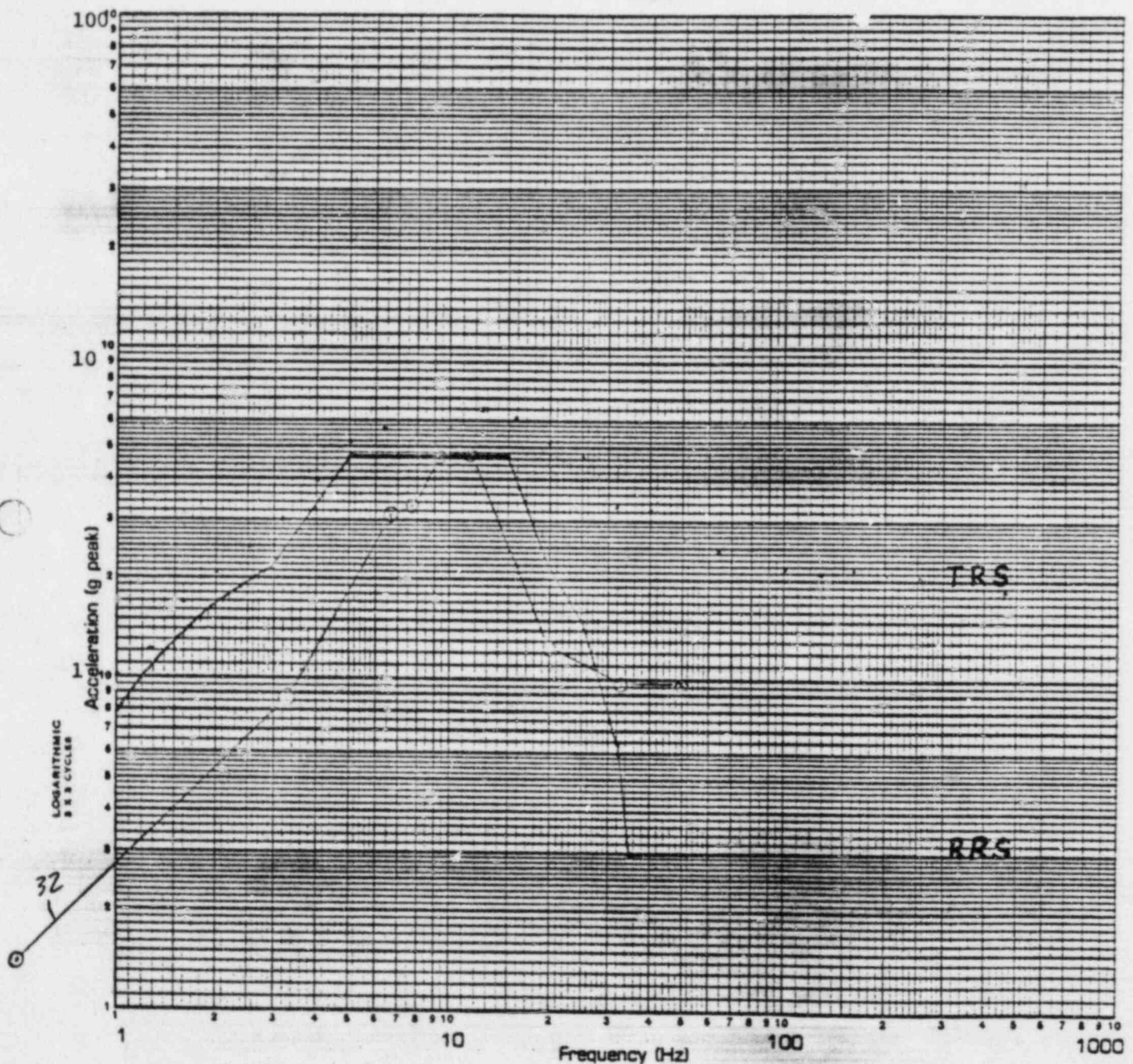
Legend

\* TRS  
⊙ Byron/Braidwood RRS

Byron/Braidwood Station  
Commonwealth Edison Co.

1.0 □ 10 □ 100 □ 1000 □

DAMPING 2%



SPECIMEN                     

LOCATION NO. VCA

Fig. 8.7

AXIS SS/V

TEST RUN NO. 16

Comparison of TRS vs RRS Vertical DBE (SSE)  
Side-to-Side/Vertical 2% Damping



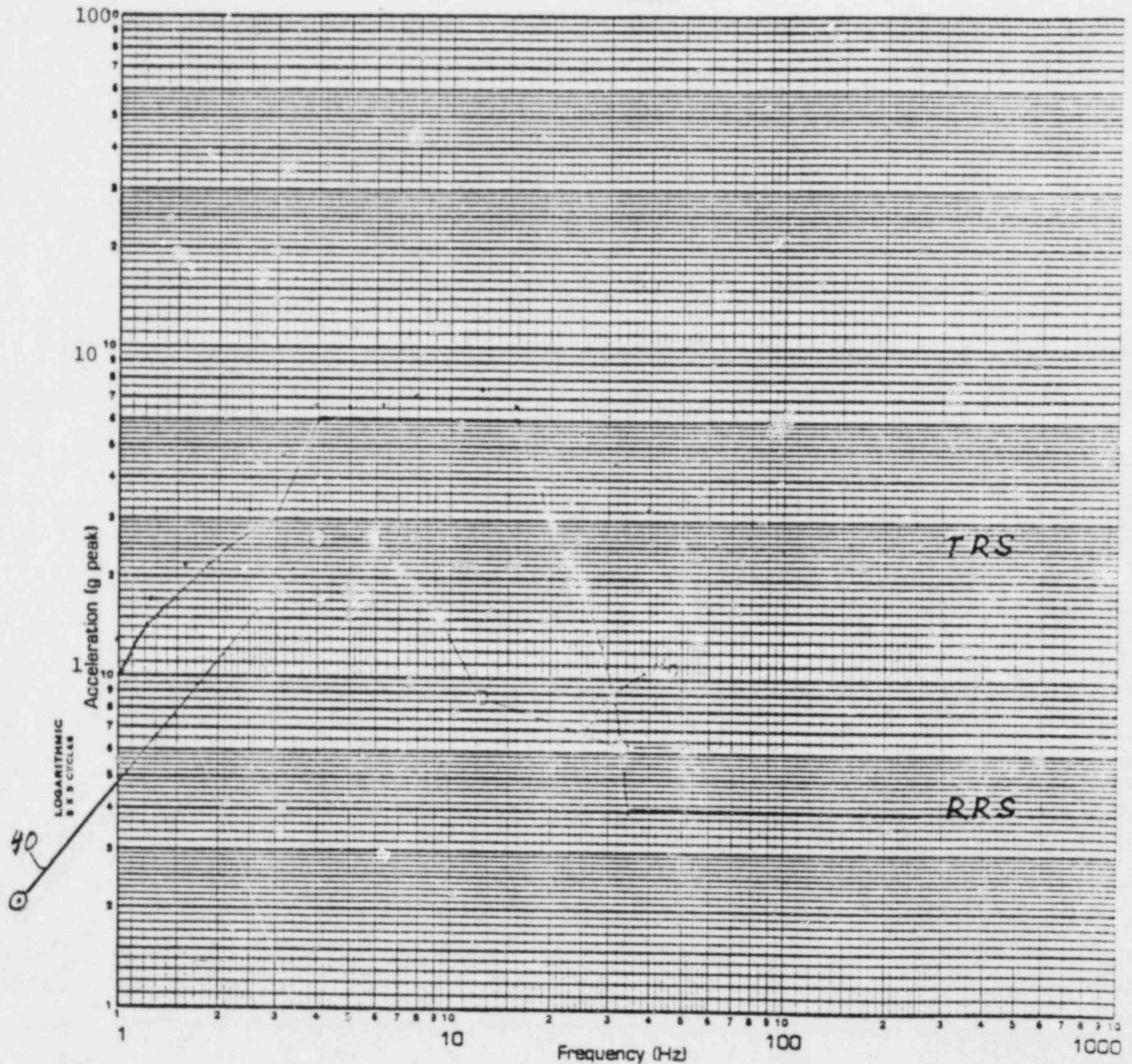
Page No. III-463  
 Report No. 44681-2  
**FULL SCALE SHOCK SPECTRUM (g Peak)**

Legend

• TRS  
 ⊙ Byron/Braidwood RRS  
 Byron/Braidwood Station  
 Commonwealth Edison Co.

1.0 ☐ 10 ☐ 100 ☒ 1000 ☐

DAMPING ☒ 2%



SPECIMEN                     

LOCATION NO. HCA

Fig 8.8

AXIS SS/V

TEST RUN NO. 10

Comparison of TRS vs RRS Horizontal DBE(SSE)  
 Side-to-Side/Vertical 2% Damping

**SARGENT & LUNDY  
ENGINEERS**

FOUNDED 1891

85 EAST MONROE STREET

CHICAGO, ILLINOIS 60603

(312) 269-2000

January 31, 1983

Project Nos. 4391/2-00

4683/4-00

Commonwealth Edison Company  
Byron/Braidwood Stations - Unit 1 & 2

Storage Batteries  
S&L Contract F/L 2819  
CECo P.O. Nos. 194757/194758  
Gould S.O. KE 5145, 5147, 5149, 5186

Mr. Howard D. Rubin,  
Product Manager  
Utility Batteries and Chargers  
Gould Inc. Industrial Battery Division  
2050 Cabot Boulevard West  
Langhorne, PA 19047

References: 1) Gould Report on Environmental  
Qualification of Class 1E  
Load-Acid Storage Batteries  
Application Engineering File No.  
068399 November 19, 1982.

2) Wyle Test Report No. 44681-2  
(2 Volumes), October 27, 1981.

Dear Mr. Rubin:

Your transmittal of December 14, 1982, submitted the referenced reports for which we offer the following comments:

- 1) Random selection of cells is required for the type test per IEEE 535-1979 Section 8, P8. However, no attempt was made to randomly select the NCX 1680 test cells, "Test specimens to be inspected and evaluated at (utility) customer installation to assure suitability for qualification purposes" (Reference 1, Section 1, Part 2.1, PCT/4). Please justify.

Mr. H. D. Rubin  
Gould Inc. Industrial Battery Division

January 31, 1983  
Page 2

- 2) No discussion was made on the accuracy of the test data even though this was a requirement of the test plan (Reference 1 Section 1, Part 9(4E), PCT/11). Please justify.
- 3) Please provide the 10 year ambient time-temperature profile for the battery room, (which was air-conditioned) where the NCX 1680 test cells were aged.
- 4) The battery load for NCX 1680 test cell was not clearly defined. This information is required for comparison with anticipated load for NCX 1200. Please provide the same.
- 5) NCX 1200 cells (Dwg. #107006D Rev. F) were purchased but type NCX 1680 cell (Dwg. #106288D Rev. K) were tested. The report states that both types are identical based on a comparison of their respective assembly drawings. However, this alone is insufficient to demonstrate similarity as required by IEEE 535-1979. For example, alloy composition is not delineated on the drawings. Please demonstrate similarity within the guidelines of IEEE 535-1979.
- 6) Seismic Test Series No. 4 test, for the NCX 1680 cells failed. After the test, cell spacer material was changed from Urethane to Polyethelyne foam type Dow Chemical (Ethe Foam No. 220) on 3/12/82, ECO #0017. This spacer material was used on failed seismic test No. 5 and successful seismic test No. 6 for the NCX 1680 naturally aged cells.
  - a) Has this material been changed out on delivered NCX 1200 cells to Byron/Braidwood?
  - b) What effect does temperature and radiation aging have on this material?
  - c) Will these aging mechanisms affect the seismic test results?
- 7) IEEE 450-1975 was used for capacity test as indicated in Reference 1 (Section 7, Addendum, PCT/72). IEEE 450-1980 was used as a reference in the test plan. Why wasn't the capacity test indicated in 450-1980 used during Wyle's test? Note capacity test requirements are different in these revisions.

SARGENT & LUNDY  
ENGINEERS  
CHICAGO

Mr. H. D. Rubin  
Gould Inc. Industrial Battery Division

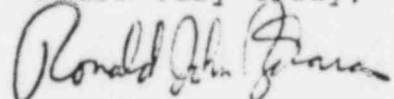
January 31, 1983  
Page 3

- 8) IEEE 535-1979, Section 8.3.1.4, says "Cells are qualified when there is no abrupt changes of more than five percent of the current or voltage of the discharge during seismic test and when the post seismic discharge capacity is 80% or more of the cells rated discharge capacity. The first part of this qualification criteria was not addressed in qualifying the naturally aged NCX 1680 cells.
- 9) It was not specifically identified in the reports (Reference 1 & 2) to what environmental and operating conditions including temperature and load durations that the purchased NCX 1200 were being qualified. This is important because anything that affected electrolyte temperature affects its life. Also, an average ambient temperature is not sufficient for qualification because cell life is exponentially related to electrolyte temperature (IEEE 535-1979, Section 6(7), Note, P7). Please provide information on the same.
- 10) The reports do not adequately deal with cell interface and connections in accordance with IEEE 535-1979 Section 5(4), P6. Please provide information on the same.

The aforementioned reports cannot be accepted until all of the noted comments are resolved. The documents must be revised as noted or acceptable justification provided. Enclosed is a stamped Status 4 copy of the cover sheets for each of the documents.

If you have any questions, please don't hesitate to call me at (312) 269-3794.

Yours very truly,



R. J. Zakaras  
Engineering Analyst  
Component Qualification  
Division

RJZ:lmd  
In duplicate  
Copies:  
J. T. Westermeier  
D. L. Leone/W. C. Cleff  
T. Eisenbart  
K. L. Adlon  
J. S. Paniaguas  

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AEM/APD/RDR/RJZ  
CQD File 003572