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**F. L. Clayton, Jr.**
Senior Vice President
Flintridge Building

Alabama Power
the southern electric system

May 3, 1983

Docket Nos. 50-348
50-364

Director, Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. S. A. Varga

Joseph M. Farley Nuclear Plant - Units 1 and 2
Technical Specification Amendment to T.S. 3/4.8.2
Electrical Power Systems

Gentlemen:

Technical Specifications 3/4.8.2.3, 3/4.8.2.4 and 3/4.8.2.5 provide specific LCO's and Surveillance Requirements for the Auxiliary and Service Water Buildings D.C. distribution systems. The standards utilized in the current Technical Specifications were based on Regulatory Guide 1.129 and IEEE Standard 450-1975. The proposed Technical Specification increases confidence of battery operability and provides time to correct certain battery conditions without undue plant shutdown. This change is requested to update the Farley Nuclear Plant Technical Specifications 3/4.8.2.3, 3/4.8.2.4 and 3/4.8.2.5 to conform with the format of the most recent Westinghouse Standard Technical Specifications (NUREG-0452, Revision 4), current industry practice, and Farley specific design parameters.

The above described changes have been reviewed by Alabama Power Company's Plant Operations Review Committee. A detailed safety evaluation is contained in Attachment 1 and the proposed Technical Specification changes are contained in Attachment 2. The Nuclear Operations Review Board will review this proposed change at a future meeting.

NRC approval of these proposed changes is requested by November 3, 1983.

This amendment is designated Class III for Unit 1 and Class I for Unit 2 in accordance with 10CFR170.22 requirements. Enclosed is a check for $4,400.00 to cover the total amount of fees required.



A015
1/40
w/check
$4,400

In accordance with 10CFR50.30(c)(1)(i), three signed originals and forty (40) additional copies of the proposed changes are enclosed.

Yours very truly,

AB McDonald

for F. L. Clayton, Jr.

FLCJr/JAR:jc-D34
Attachments
cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge
Mr. J. P. O'Reilly
Mr. E. A. Reeves
Mr. W. H. Bradford

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 3rd DAY OF May, 1983.

Linda Hunter
Notary Public

My Commission Expires:

1-10-87

ATTACHMENT 1

SAFETY EVALUATION FOR PROPOSED CHANGES
TO THE FNP-1 AND 2 TECHNICAL SPECIFICATIONS

## I. BACKGROUND

Technical Specifications 3/4.8.2.3, 3/4.8.2.4 and 3/4.8.2.5 provide specific LCO's and Surveillance Requirements for the Auxiliary and Service Water Buildings D.C. distribution systems. The standards utilized in the current Technical Specifications were based on Regulatory Guide 1.129 and IEEE Standard 450-1975. A change is requested to update the Farley Nuclear Plant Technical Specifications 3/4.8.2.3, 3/4.8.2.4 and 3/4.8.2.5 to conform with the Farley specific plant design and the format of the most recent Westinghouse Standard Technical Specifications (WSTS) which considers IEEE Standard 450-1980. This change increases confidence of battery operability and provides time to correct certain battery conditions without undue plant shutdown.

## II. REFERENCES

FNP-1 Technical Specifications

FNP-2 Technical Specifications

Westinghouse Standard Technical Specifications
(NUREG-0452, Revision 4)

Regulatory Guide 1.129

IEEE Standard 450-1975

IEEE Standard 450-1980

## III. BASES

NUREG-0452, Revision 4 contains the current NRC approved WSTS. The change request submitted herein conforms to this approved revision as adapted to Farley specific conditions utilizing the current IEEE Standard 450-1980.

The following are differences between the proposed Technical Specifications and the currently approved WSTS:

1. The WSTS assume a manufacturer's recommended full charge specific gravity of 1.215. With such full charge specific gravity, the WSTS resultant test criteria are 1.200 for Category A testing (once per week) and 1.195 for Category B testing (once per 92 days). The Farley batteries have a manufacturer's recommended

specific gravity of 1.210 for the Service Water Building batteries and 1.215 for the Auxiliary Building batteries. As a result, the existing Technical Specification criterion was established at 1.190 for both batteries since setting different standards would result in an unnecessary complication of the surveillance test procedures. The proposed Technical Specification is therefore based on the currently approved Technical Specification criterion as modified to conform with the WSTS format. The resultant proposed criteria for specific gravity is therefore 1.195 for Category A and 1.190 for Category B testing as shown in Table 4.8-2.

The proposed Table 4.8-2 Category B allowable limit on specific gravity has been revised from the WSTS criterion of 0.02 below the average of all connected cells to 0.080 from the values observed in the previous 92 day test. There have been two occasions at the Farley Nuclear Plant where the WSTS criterion of 0.020 would have resulted in declaring the batteries inoperable. In both of these cases, surveillance testing was performed and the batteries were proven operable. The current Technical Specification value of 0.080, which has been approved by the NRC, has been shown during past experience at the Farley Nuclear Plant to be an effective surveillance criteria.

2. The WSTS require a voltage of 2.13 for Category A and B limits and 2.07 volts for Category B allowables. The current Technical Specification cell voltage value of 2.02 volts was based on the FSAR safety analysis. In order to conform with the current WSTS format, the resultant proposed criteria for Category A and B limits is 2.07 volts while Category B allowables remain 2.02 volts.

3. The WSTS require declaring the batteries inoperable if the connection resistance or electrolyte temperature values deviate from the WSTS limits. The proposed Technical Specification allows a 24 hours action period to correct either a temperature or connection resistance deviation without declaring the battery inoperable. IEEE Standard 450-1980 paragraph 4.4.1 (2) and (3) states that the 5°F temperature and connection resistance deviations are merely an indication of a condition that can be easily corrected prior to the next general inspection and does not state that these are indications on which the battery should be declared inoperable.

4. A value of 1500 microhms from post to post for the connection resistance check is utilized in the proposed Technical Specification in lieu of 150 microhms stated in the current WSTS for the Service Water Building batteries. In the judgement of Alabama Power Company, the WSTS criteria of 150 microhms is based on a post to post copper bar connection. The Farley Nuclear Plant Service Water Building batteries utilize a braided cable vice a copper bar for the post to post connection. The resistance in a braided cable connection is substantially different from the value given in IEEE Standard 450-1980 and was considered in establishing a performance standard.

5. In accordance with the WSTS, all battery charger test amperages and times are provided based on the actual system design standard.

6. Annual test requirements have been changed from 18 months to 24 months to accommodate future 18 month refueling intervals as specified in Alabama Power Company's letter to the NRC of April 5, 1983.

7. The proposed Technical Specification complies with the WSTS for Modes 5 and 6 with the exception of depressurizing the Reactor Coolant System through a vent. Low temperature overpressure protection of the Reactor Coolant System is provided by spring-loaded mechanical relief valves. There is no need, therefore, to depressurize through a vent if the batteries are inoperable since overpressure protection is not dependent on the batteries.

This proposed Technical Specification therefore conforms with the intent of the approved WSTS and increases confidence of battery operability. All deviations noted above and in Attachment 2 are Farley specific adaptations which are based on IEEE Standard 450-1980, the basis for the WSTS.

## CONCLUSION

Alabama Power Company hereby requests the proposed Technical Specification changes contained in Attachment 2. These proposed changes do not have a significant impact on the safe operation of the Farley Nuclear Plant.