THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

July 25, 1985
PY-CEI/NRR-0299 L

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Conformance to Regulatory
Guide 1.129/IEEE 450-1980

Dear Mr. Youngblood:

Our letter dated April 2, 1985 (PY-CEI/NRR-0222L) modified PNPP's commitment to Regulatory Guide 1.129 by citing conformance to IEEE 450-1980 in lieu of IEEE 450-1975. We have determined that an exception to one of the test requirements of the regulatory guide is desirable in order to yield a more accurate representation of battery condition and deterioration.

IEEE 450-1975 required that the service discharge test be performed without benefit of any "get ready" maintenance. IEEE 450-1980 allows a "get ready" option prior to performance of the service test. Both versions of the standard require a service test every 18 months and a battery performance discharge test every 60 months. We propose to perform the service test, without utilizing the "get ready" option, every 18 months unless it coincides with the 60 month battery discharge test; in which case, only the battery discharge test will be performed. Testing in this manner provides a more reliable indication of battery condition than does using the "get ready" option and/or performing the battery service test coincidental with the 60 month battery performance discharge test. Proposed revised FSAR text is attached and will be incorporated in a future FSAR amendment.

Please feel free to contact me if you have any questions concerning this matter.

Very truly yours,

Murray R. Edelman

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc
Attachment

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe

Boo!
1/1

TABLE 8.1-2 (Continued)

Publication	Discussion
Regulatory Guide 1.106	The Class 1E power system does not include thermal overload relays to protect motor operated valves; therefore, this Regulatory Guide is not applicable to the design.
Regulatory Guide 1.108	The guidelines presented in Regulatory Guide 1.108 are used in establishing preoperational and periodic test procedures for the standby and HPCS diesel generators, with the exception that "first out" annunciation is not used. The basis for this is individual protective trip alarms, which give the operator adequate information for correct action.
Regulatory Guide 1.118	Periodic testing of electric power and protection systems is in accordance with IEEE Std. 338-1977, as modified by Regulatory Guide 1.118.
Regulatory Guide 1.120	Refer to Section 9.5.1 for details.
Regulatory Guide 1.128	Class 1E batteries are designed and installed in accordance with IEEE Std. 484-1975, as modified by Regulatory Guide 1.128, except that a hydrogen survey will not be performed. Calculations indicate that the maximum hydrogen concentration in the battery area will be less than 0.001%.
Regulatory Guide 1.129	Class IE batteries are maintained and tested in accordance with IEEE 450-1980, a Revision to IEEE 450-1975 which is endorsed by R.G. 1.129. In addition, the 60 mo. battery performance discharge test may be performed in lieu of the battery service test when they are scheduled coincidentally. This allowance is reflected in Plant Technical Specifications.
Branch Technical Position ICSB 2	Standby diesel generators are type qualified in accordance with ICSB 2. The HPCS diesel generators are type qualified as described in Section 8.3.
Branch Technical Position ICSB 8	As required by ICSB 8, onsite diesel generators will not be used for peaking service.

TABLE 1.8-1 (Continued)

Regulatory Guide (Rev.;RRRC Category)	Degree of Conformance	Reference
1.126 - (Revision 1 - 3/78;RRRC Cat. 1)		
An acceptable model and related statistical methods for the analysis of fuel densification.	GE is currently working with the fuel fabrication facility to see that the fabrication conforms to this guide.	4.2
1.127 - (Revision 1 - 3/78;RRRC Cat. 3)		
Inspection of water control structures associated with nuclear power plants	PNPP conforms to this guide as it applies to the intake and discharge control structures.	
1.128 - (Revision 1 - 10/78;RRRC Cat.1)		
Installation design and installation of large lead storage batteries for nuclear power plants	Class 1E batteries are designed and installed in accordance with IEEE Standard 484-1975, as modified by Regulatory Guide 1.128, except that a hydrogen survey will not be performed. Calculations indicate that the maximum concentration in the battery area will be less than 0.001%	8.1
1.129 -(Revision 1 - 2/78;RRRC Cat. 1)		
Maintenance, testing, and replacement of large lead storage batteries for nuclear power plants	PNPP conforms to R.G. 1.129 with the following exceptions: 1. R.G. 1.129 endorses IEEE 450-1975. PNPP is adopting IEEE 450-1980 in lieu of IEEE 450-1975. 2. If scheduling of the 60 mo. battery performance discharge test coincides with the 18 mo. battery service test, only the 60 mo. battery performance test will be performed.	8.1
1.130 - (Revision 1 - 10/78;RRRC Cat.2)		
Service limits and loading combinations for Class 1 Plate-and -Shell-Type component supports	Regulatory Guide 1.130 is not addressed in the PNPP FSAR since the construction permit was issued prior to October 31, 1978 as referenced in Section D of the Guide.	