U. S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION V

Report No. 50-344/79-09

Docket No. 50-344 License No. NPF-1 Safeguards Group

Licensee: Portland General Electric Company
121 S. W. Salmon Street
Portland, Oregon 97204

Facility Name: Trojan

Inspection at: Rainier, Oregon

Inspection conducted: March 27-30, 1979

Inspectors: P. H. Johnson, Reactor Inspector — 5/21/79 Date Signed

A. D. Johnson, Reactor Inspector — 5/18/79 Date Signed

A. J. Horn, Reactor Inspector — 5/18/79 Date Signed

Approved By: D. M. Sternberg, Chief, Reactor Project Section 1, Reactor Operations and Nuclear Support Branch — 5/21/79 Date Signed

Summary:

Inspection on March 27-30, 1979 (Report No. 50-344/79-09)

Areas Inspected: Routine, unannounced inspection of licensee event reports, response to IE Bulletins and Circulars, document control, management controls, ILRT preparations, and followup on previous inspection items; also included independent inspection effort. The inspection involved 72 inspector hours onsite by three NRC inspectors.

Results: No deviations or items of noncompliance were identified.

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DETAILS

1. Persons Contacted

*B. Withers, Plant Superintendent
*F. Lamoureaux, Assistant Plant Superintendent
R. Barkhurst, Operations Supervisor
*W. Orser, Engineering Supervisor
*J. Perry, Administrative Engineer
*J. Reid, Quality Assurance Supervisor
*R. Schmitt, Chief Nuclear Plant Engineer
*T. Walt, Radiation Protection Supervisor

The inspectors also interviewed other licensee employees during the course of the inspection. These included reactor operators, shift supervisors, maintenance personnel, and plant staff engineers.

*Denotes those attending the exit interview.

2. Followup on Previous Inspection Findings

(78-12-02, Open) Reactor Vessel Level Control During Maintenance Activities: The licensee had initiated requests for design change (RDCs) No. 78-051 and No. 78-052 to provide improved indication of level in the reactor vessel during maintenance conditions. These RDCs will provide a standpipe which is vented to the pressurizer, with a TV camera providing the control room operator the ability to observe the level indication directly. This item remains open pending completion of the modifications.

(78-19-02, Closed) Fire Brigade Training: The inspector verified by examination of lesson plans, training schedules, and training records that fire drills and fire brigade training had been implemented consistent with the licensee's commitment.

(78-19-01, Open) Documentation of Design Changes: A licensee task group was drafting recommendations to management regarding actions to expedite the completion of design change documentation. This study was initiated by the licensee as a result of a QA audit conducted in June 1978.

3. Licensee Event Report

During a previous inspection (Inspection Report No. 50-344/78-26) the inspector reviewed the licensee's actions in response to LER 78-20, Grouting of Piping Penetrations. Revision 3 to LER 78-20, dated 12/26/78, outlined the design changes being made by the licensee. The changes involved either removal of grout or modification of nearby piping supports to avoid excessive stresses. Completion of in-plant work associated with

the modifications was verified by the resident inspector prior to the resumption of power operation on January 2, 1979. During the current inspection, the inspector examined the licensee's documentation of the design changes related to LER 78-20. Two of the three as-built packages (ABPs) related to this design change (RDC 78-063) were in the completed files with ABP No. 2 still undergoing engineering review. Examination of ABPs No. 1 and No. 3 did not indicate any discrepancies with respect to the licensee's procedures for the processing of design changes. (Closed)

Comments on the timeliness of drawing changes are presented separately in Paragraph 5.

No deviations or items of noncompliance were identified.

4. Document Control

The Document Control Program was reviewed for conformance with Technical Specifications, Regulatory Requirements and licensee commitments. Applicable Quality Assurance procedures were reviewed to verify that responsibilities are assigned for document control to assure conformance with the requirements. A random selection from controlled copies of several Plant Operating Manual procedures and drawings (P&IDs) was made and it was verified that revision numbers for the selected controlled copies were consistent with the master revision index file.

The timeliness of incorporating Design Changes into plant drawings is discussed in Paragraph 5.

No deviations or items of noncompliance were identified.

5. Documentation of Design Changes

During review of design changes the inspectors made certain observations related to the control of plant drawings. During the processing of a request for design change (RDC), Plant Engineering issues an interim drawing change notice (IDCN) which (along with necessary procedures) gives directions for accomplishing the work. Upon completion of work, the IDCN is marked up to show any changes approved during performance of the work. This is then issued by Plant Engineering as a drawing change notice (DCN), which serves as a basis for issuing revisions to plant drawings. The inspector noted that relevant DCNs were cross-referenced on the licensee's drawing index, as required by plant procedures to allow the user of a drawing to determine which DCNs apply to it (pending issuance of a revised drawing). The inspector noted, however, that several months can elapse after completion of in-plant work before necessary DCNs are issued, with

system changes not reflected on the drawing index during the interim period. The inspectors also observed that the status of pending RDCs cannot be found in any single location, making the design change program more difficult to control and audit. The licensee stated during the exit interview that these matters would be evaluated during the ongoing review of design change package completion (see Paragraph 2, Item 78-19-01). (79-09-01)

No deviations or items of noncompliance were identified.

6. Review of Management Controls

This inspection included a review of the licensee's management control procedures against the requirements set forth in ANSI 18.7-1976. The licensee is currently committed to the requirements of ANSI 18.7-1972, and no deviations from the requirements of that standard were observed. Although the licensee has not committed to the requirements of ANSI 18.7-1976, this review was conducted to determine whether significant differences existed between the licensee's existing management controls and the more recent requirements. The inspector examined and discussed with licensee representatives pertinent documents related to facility organization; review and audit; and the programs, procedures, and policies used to control safety related activities at the plant. The licensee stated that the areas discussed would be evaluated to determine whether or not changes to existing programs, policies and procedures would be advisable.

No deviations or items of noncompliance were identified.

7. IE Circular Followup

The inspectors followed up on licensee actions related to two IE Circulars, with findings as follows:

IE Circular 78-08, Environmental Qualification of Class IE Equipment (Closed): This matter is now the subject of IE Bulletin No. 79-01, which requires a written response from the licensee by June 10, 1979. Further review of the licensee's actions related to this subject will be documented as followup on IEB 79-01.

IE Circular 79-02, Failure of 120 Volt Vital AC Power Supplies (Closed): The licensee had reviewed the circumstances outlined in this circular and determined that similar conditions would not occur at Trojan. In particular, the vital inverters at Trojan do not utilize an automatic transfer or time delay circuitry. Optimum transformer tap settings were also verified.

8. CILRT Preparations

The inspector discussed licensee preparations for the containment integrated leak rate test (CILRT) to be performed during the spring maintenance outage. The licensee stated that the peak pressure test will be performed using the guidelines of the Bechtel Topical Report, BN-TOP-1, Rev. 1.

9. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on March 30, 1979. During the exit interview, the inspectors summarized the scope and findings of the inspection as discussed in Paragraphs 2 through 8. The licensee confirmed that the updating of plant drawings and the tracking of design change completion would be evaluated along with the ongoing review of the design change process (Paragraph 5).