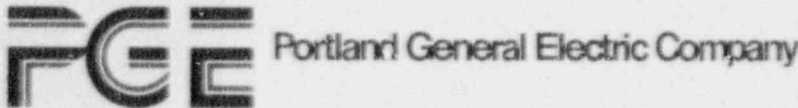


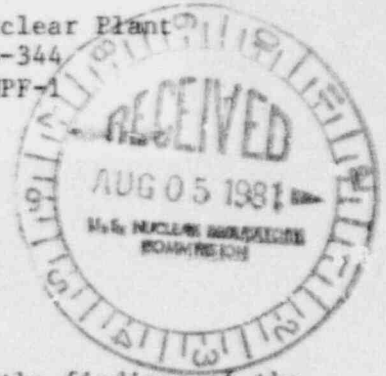
DCS (no Externals)
Return to N. Moseley
IDE



Bart D. Withers Vice President

July 31, 1981

Trojan Nuclear Plant
Docket 50-344
License NPF-1



Mr. Victor Stello, Jr., Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Stello:

In response to your letter of June 23, 1981 regarding the findings of the management inspection [81-02(PAS)] conducted by the Office of Inspection and Enforcement, enclosed as Attachment A are the responses to each of those four areas identified as below average.

We were somewhat surprised by the overall lower performance marks assigned to the individual inspection areas addressed by this report. We expected closer correlation between the grades assigned and the more favorable comments noted in the course of several exit meetings and during the inspection itself.

Many of the report findings refer to our program methodology without an assessment of the programs results. To reduce the overall subjective nature of these inspections, we recommend an assessment be made of the results of a licensee's programs. This approach would allow for differing licensee methods within regulatory boundaries.

PG&E welcomes the suggestions of the Management Inspection Report as an opportunity for even greater improvement.

Sincerely,

Bart D. Withers
Vice President
Nuclear

Enclosure

c: Mr. R. H. Engelken, Director
U. S. Nuclear Regulatory Commission
Region V

Mr. Lynn Frank, Director
State of Oregon
Department of Energy



B. D. Withers 66-6575

Portland General Electric
121 S.W. Salmon Street
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Mr. Victor Stello, Jr., Director
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
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Form 6-14-035



PGE RESPONSES TO
NRC PERFORMANCE APPRAISAL BRANCH INSPECTION

NON-LICENSED TRAINING

PAB Summary: A comprehensive program for non-licensed training for all personnel is not established. The effectiveness of the non-licensed training program which had been implemented was not adequately evaluated by management. Individual employees' training needs had not been adequately determined and established by management. Additionally, there were weaknesses in Quality Assurance (QA) training of the plant and corporate staffs as demonstrated by a lack of understanding of the QA Program.

PGE Response: A corporate personnel training program is being developed. This program is intended to be a structured series of sessions for new employee training and continued development of current employees. It is planned for this program to provide instruction for new employees badged for Trojan in the areas of quality assurance, radiation protection, security, Plant safety, Plant design features, Plant design criteria, Plant accident analysis, and Plant licensing requirements and regulations. Implementation of this program is anticipated in 1982 to supplement the self-study and on-the-job training of all Nuclear Division employees.

A maintenance training program had been established at the Trojan Nuclear Plant but not fully implemented at the time of the PAB inspection. The maintenance training program has now been implemented. Maintenance training on Plant systems will recommence after the present refueling outage. Management will periodically evaluate and assess the non-licensed training program, both at the Plant and in the corporate offices, to determine its effectiveness and its ability to provide qualified, trained employees. A new training specialist was hired in May 1981 and will be assigned specific responsibility for general systems training for non-licensed personnel.

QA training for both Plant staff and corporate personnel will be improved. A discipline-oriented QA program will be developed by March 1982 and implemented by September 1982 to eliminate the lack of understanding of the QA Program, particularly as it applies to corrective action systems.

Training and development of managers, supervisors, and other nonunion personnel is implemented and documented as a provision of the Portland General Electric Performance Appraisal Program. The Performance Appraisal Program provides for an annual evaluation of an employee's overall performance at his particular position. This evaluation will determine if an employee is capable and still qualified to fill his present position and, by requiring documentation of his performance and participation in formal training, whether he is eligible to assume positions of greater responsibility.

CORRECTIVE ACTION SYSTEMS

PAB Summary: A program was established for the control of corrective action activities; however, the lack of understanding of the corrective action system by personnel due to marginal indoctrination and training resulted in the failure to identify and document a number of conditions adverse to quality as required by program procedures. The failure to document adverse conditions limited the data provided to plant and corporate management and independent review groups, severely hampering the effectiveness of the corrective action program as a viable management tool. Furthermore, the corrective action program, as implemented, appeared to concentrate primarily on the determination of reportability to the NRC instead of requiring the identification of all conditions adverse to quality and allowing a management evaluation to decide the reporting requirements. Thus the use of the program as one of the measures of the effectiveness of the QA Program and ensuring management awareness of conditions adverse to quality was limited.

PGE Response: To increase the awareness and understanding of the Quality Notice (QN) and Non-Conformance Report (NCR) corrective action systems, the discipline-oriented QA training referred to in the response to non-licensed training will include specific training on the use, application, initiation, and disposition of QNs, NCRs, and Quality Assurance Finding Reports (QAFRs) and LOOP items (open findings found during a QA audit of less significance than QAFRs).

Additionally, a number of Plant procedures will be revised to increase the effectiveness of the corrective action systems. In particular, the Plant Review Board (PRB) Charter, Administrative Order, AO-2-1, will be revised to require the PRB to review all NRC enforcement findings. Maintenance Procedure MP-4-1, "Maintenance Records, Forms, and Drawings", will be revised to delineate the requirements for supervisory review of completed Maintenance Requests to ensure complete documentation of corrective action. Maintenance personnel will be reinstructed to provide better documentation of corrective action taken when repairs are performed on failed equipment. QA Procedure QAP-16, "Corrective Action Control and Documentation", will be revised to require the QA staff to review all QNs and NCRs for significant conditions adverse to quality and substantial safety hazards, such as Reportable Occurrences, Safety Limit Violations, Abnormal Environmental Occurrences, Violations of the Operating License or Technical Specifications, and Nonconformances or generic defects which could cause a major reduction in the degree of protection provided to the public health and safety. These revisions will be complete by January 1982. If any of the above conditions are suspected or identified, a Possible Reportable Occurrence/Event (PRO/E) form will be initiated to ensure a PRB review of the occurrence.

Formal instructions will be prepared to provide guidance to the Quality Assurance staff on annual and semiannual trend analyses. These instructions will improve the trend analysis methodology and result in better sensitivity to different types of trends.

Possible Reportable Occurrence/Event (PRO/E) forms and the detailed write-up that appears in the PRB minutes are reviewed by the Plant General Manager. His concurrence with the conclusions of the PRB and the corrective action recommended will be documented on the bottom of each set of PRB meeting minutes.

The Nuclear Operations Board (NOB) charter will be revised and NOB staff procedures will be prepared to require the NOB to document their bases for reaching their conclusions concerning violations of the Technical Specifications. This will be completed by September 1981. The new NOB charter and procedures will also document any follow-up action on LERs and Technical Specification violations to be identified, including follow-up inspections, to assure effectiveness of corrective actions. To increase the cognizance of the NOB of audits of facility activities, the Quality Assurance staff trend analysis reports will be provided to and will be considered by the NOB. A monthly summary report of the status of all outstanding noncompliances identified by the NRC inspections will be modified to include not only the noncompliance but also a summary of the response, corrective action if applicable, and a determination as to whether the noncompliance constituted a violation of the Technical Specifications. This report will be provided to the NOB and included on the agenda for regular NOB meetings. NRC inspection reports will be provided to the NOB. Quality trend analyses will also be provided and will include PRO/Es, Quality Assurance Staff (QAS) findings, Maintenance Requests, NCRs issued by other than QAS, audit report findings and other conditions adverse to quality.

With respect to making a determination as to whether or not each violation of a Technical Specification constitutes an unreviewed safety question, there appears to be an error in Technical Specification 6.5.1.7(b). In accordance with 10 CFR 50.59, an unreviewed safety question arises only when a proposed change, test, or experiment is being considered. Further, the action required in the event an unreviewed safety question is involved is to obtain prior Commission approval by submitting an application for amendment of the license. Violations of Technical Specifications are not proposed changes, tests, or experiments, and prior Commission approval has been mooted by the violation itself; thus, a determination of unreviewed safety question appears inapplicable to Technical Specification violations. We will propose a revision to the Trojan Technical Specification 6.5.1.7(b) to clarify this point.

Of the three PRO/Es identified as still being open in the PAB report, 80-060 and 81-003 have been closed out and found to be not reportable. 80-031, "Nozzle Loading Questionable", is still undergoing a detailed analysis for such determination.

COMMITTEE ACTIVITIES

PAB Summary: The Plant Review Board (PRB) and Nuclear Operations Board (NOB) included capable individuals who are active in their review responsibilities. There were, however, significant weaknesses in the scope of the PRB and NOB review activities. There was a lack of formalized training for the PRB and NOB members. Furthermore, the review of procedure and design change safety evaluations by the NOB was untimely.

PGE Response: Weaknesses in the scope of the PRB and NOB review activities are being corrected by revising Plant Administrative Order AO-2-1, PRB Charter, and Standard Practice Instruction SPI 200-4, Trojan Nuclear Operations Board. Revisions to these procedures are anticipated to be completed and implemented by August 31, 1981. The revision for the PRB Charter will include the following:

1. A description of the responsibility of the PRB members, as well as a statement of their qualifications for both members and alternates.
2. The requirement to review documents that may involve Technical Specification violations and which may indicate operational trends adverse to Plant safety, including such items as NRC inspection reports and PGE responses involving enforcement findings. NRC Bulletins and Circulars and the corresponding PGE responses will be reviewed by the PRB. Audit reports will also be routed to PRB members for their review and if appropriate, discussed in PRB meetings. Changes to the QA Program are currently reviewed by the PRB; however, PRB members will be added to the distribution list for NOB meeting minutes.
3. A requirement to include a discussion on facilities and facility operation in PRB meetings.
4. A requirement to provide an in-session review of out-of-session items.
5. A requirement for the PRB to make a positive statement in the PRB minutes on items of obvious safety significance that "based on the PRB discussion, no (or an) unreviewed safety question exists".
6. A requirement for the PRE to investigate all violations of the Technical Specifications, including NRC enforcement findings and internal audit findings against the Technical Specifications.

7. A requirement to provide instruction to the PRB members on the definition and determination of unreviewed safety questions.

The NOB Charter, SPI 200-4, will be revised to include the following:

1. A requirement that the NOB staff be assigned the responsibility for assuring that all required reviews are completed and to verify the completion of corrective actions for problems or any other actions identified by the NOB.
2. Clarification as to how dissenting opinions can be and should be documented in NOB meeting minutes and/or inter-office memoranda.
3. A clarification to better define the functions and responsibilities of the NOB members, specifically providing additional guidance concerning review responsibilities to ensure that each new NOB appointee is provided the necessary guidance to perform his duties.

In addition, steps have been taken to augment the resources available to support the NOB reviews of safety evaluations. This action had been initiated prior to the PAB team audit and is being implemented at the present time.

It is currently planned that the review of safety evaluations and procedure changes completed under the provision of 10 CFR 50.59 will be reviewed by the NOB on a quarterly basis. The future use of consultants to provide support for the NOB will be in accordance with quality assurance procedures. Procedures for the NOB are being developed to clarify the procurement requirements for such services.

QUALITY ASSURANCE AUDITS

PAB Summary: The program for performing quality-related audit activities was established; however, the program procedures lacked adequate detail to ensure the performance of all program commitments, to require the use of audit and surveillance personnel with specific technical expertise in the areas audited, to ensure adequate handling of audit findings, and to provide a comprehensive method for evaluating the effectiveness of the QA program.

PGE Response: Revisions to established Plant and Corporate procedures and instructions will be made in order to provide the necessary detail to ensure the performance of all program commitments, to ensure adequate handling of audit findings and to provide a comprehensive method for evaluating the effectiveness of the QA program.

In the area where periodic reviews of quality-related procedures are required, the inconsistencies between Corporate procedures and the Plant procedures will be corrected. Efforts will be made to assign audit personnel to an audit team that collectively has the experience or training commensurate with the scope, complexity, or special nature of the activities to be audited.

Although the audits and surveillance inspections performed by the onsite QA staff are intended to supplement the Nuclear Projects QA audits and do so by covering various plant activities as they are scheduled to occur, to ensure continuity of coverage, the QA staff audit and surveillance inspection will be scheduled at a suitable frequency by October 1981.

Although an independent audit of the overall QA program has been performed in the past, this independent audit has not included all portions of the QA program. Therefore, PGE is planning a QA program audit by a joint utility management audit team. It is our current plan to have the joint utility management audit completed prior to December 31, 1981.

The necessary procedures will be revised to require the trend reports for audits and surveillance inspections performed onsite by the Plant QA staff include significant findings closed during the audits and inspections and be provided to the NOB and QAB. QA Program and Technical Specification violations and problems identified by contractors that were closed out during Plant QA audits will also be provided to the NOB and QAB. Furthermore, staff assistance has been provided to the NOB. One of the functions of this NOB staff is to perform more indepth evaluations of operations, experience, and feedback from the QA program to evaluate its effectiveness. An integrated safety assessment program, which would more effectively coordinate the activities of the operational assessment review of the Shift Technical Advisors, the audits and surveillances of the Plant QA staff and Nuclear Projects Quality Assurance Department, and the reports and assessment of the Plant Staff and other departments supporting Trojan Nuclear Plant activities will be developed.

Lower-tier procedures will be evaluated against Section 6.8 of the Trojan Technical Specifications to ensure that all procedures requiring PRB review and Plant General Manager approval are treated accordingly. PRB review and Plant General Manager approval of any such identified procedures will be completed by October 1981. Quality Assurance Procedure QAP-6 and Administrative Order AO-2-1 will be revised by August 31, 1981 to clarify the policies related to lower-tier procedures.