

PORTLAND GENERAL ELECTRIC COMPANY  
EUGENE WATER & ELECTRIC BOARD  
AND  
PACIFIC POWER & LIGHT COMPANY  
  
TROJAN NUCLEAR PLANT

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Operating License NPF-1  
Docket 50-344  
License Change Application 55

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This License Change Application is submitted in support of Licensee's intent to reorganize the Plant Operating Staff and to reflect changes in Licensee's corporate organization.

PORTLAND GENERAL ELECTRIC COMPANY

By *D. J. Broehl*  
D. J. Broehl  
Assistant Vice President  
Generation Engineering-Construction Division

Subscribed and sworn to before me this 13<sup>th</sup> day of August 1979.

*Carole A. Hodgdon*  
Notary Public of Oregon

My Commission Expires: August 9, 1983

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Change the Technical Specifications as follows:

1. Specification 6.1.1. (Page 6-1): Change "Plant Superintendent" to "General Manager".
2. Replace Figure 6.2-1 (Page 6-2) of Appendix A and Figure 5.1 (Page 5-9) of Appendix B with new figures as provided in Attachment A which reflect changes in PGE's corporate organization described under "Reason for Change" below.
3. Replace Figure 6.2-2 (Page 6-3) of Appendix A and Figure 5.2 (Page 5-10) of Appendix B with new figures as provided in Attachment A which reflect intended reorganization of the Plant Operating Staff under "Reasons for Change" below.
4. Specifications 6.4.1 and 6.4.2 (Page 6-5): Change "Plant Superintendent" to "General Manager".
5. Specification 6.5.1.1 (Page 6-5): Change "Plant Superintendent" to "General Manager".
6. Specification 6.5.1.2 (Page 6-6):
  - a. For the Chairman, change the title "Plant Superintendent" to "Manager, Technical Services".
  - b. Delete the "Assistant Plant Superintendent".
  - c. Add to the Plant Review Board: "Member: Radiation Protection Supervisor".
7. Specification 6.5.1.6.a (Page 6-6): In the third line, change "Plant Superintendent" to "General Manager".
8. Specification 6.5.1.7 (Page 6-7):
  - a. In Paragraph a, change "Plant Superintendent" to "General Manager".
  - b. In Paragraph c, change "Plant Superintendent" to "General Manager".
9. Specification 6.5.2.2 (Page 6-9); make the following changes:
  - a. Change the title "Chief Mechanical Engineer, Generation Engineering" to "Designated Mechanical Engineer, Generation Engineering".

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- b. Change the title "Chief Electrical Engineer, Generation Engineering" to "Designated Electrical Engineer, Generation Engineering".
  - c. Change the title "Chief Nuclear Engineer" to "Designated Nuclear Engineer, Generation Licensing & Analysis".
  - d. Change the title "Manager of Environmental Services" to "Designated Representative of Office of Environmental and Analytical Services".
  - e. Delete the "Director of Analytical Laboratory".
  - f. Delete the "Trojan Plant Superintendent".
- 9. Add a sentence at the bottom as follows: "Designated members shall be appointed in writing by the Executive Vice President".
  - 10. Specification 6.5.2.3 (Pages 6-9): Change "NOB Chairman" to "Executive Vice President".
  - 11. Specification 6.5.2.6 (Page 6-9); in the second line, change "four" to "three".
  - 12. Specification 6.8.2 (Page 6-13): Change "Plant Superintendent" to "General Manager".
  - 13. Specification 6.8.3.c (Page 6-14): Change "Plant Superintendent" to "General Manager".

REASON FOR CHANGE

This change is necessary so that Portland General Electric (PGE) Company operations in support of the Trojan Nuclear Plant continue in strict accordance with Facility Operating License (FOL) NPF-1 and its Appendices.

The change in PGE corporate organization is primarily one of title changes and the reporting relationships of certain positions. Only two new positions are created in direct support of Plant operations. These changes are explained as follows:

- 1. Environmental Sciences and the Analytical Laboratory Departments have been combined into one division managed by the Assistant Vice President, Office of Environmental and Analytical Services.
- 2. The PGE Purchasing Department is now managed by the General Manager, Purchasing Department, who reports to the Assistant Vice President, Procurement, Property, and Fleet Management.

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3. The Chief Nuclear Engineer title has been changed to Manager, Generation Licensing & Analysis, with no change in departmental responsibilities or composition.
4. Nuclear fuel management has been concentrated and assigned to one separate department, headed by the Manager, Fuel Operations, with no change in responsibilities or composition.
5. The position of Director, Corporate Security, was created to manage corporate security and administer nuclear plant security.
6. The position of Trojan Safety Coordinator, reporting to Industrial Relations, was created to be responsible for the Trojan Nuclear Plant Fire Protection Program and other safety programs.
7. The Trojan Plant General Manager and the Director of Analytical Laboratory are to be removed from membership on the Nuclear Operations Board (NOB) to reduce the number of members, eliminate redundancy in expertise, provide additional independence from power production, and increase the efficiency of the Board. The quorum is changed to reflect this reduction in NOB membership.
8. The title of "Superintendent of Electrical Maintenance and Construction" has been changed to "General Manager, Electrical Maintenance and Construction".

The changes in the Trojan Operating organization are those felt to be necessary to strengthen the management control and functions. These changes incorporate PGE's management review and assessment of organizational changes that should be made as a result of the Three Mile Island accident. Technical support is enhanced. The one-on-one-on-ten structure that presently exists sometimes results in cumbersome and difficult communications and coordination of activities. The growth of the Operating Staff since the organizational structure was originally adopted has caused it to become outmoded and at times inefficient. In the event of an emergency with the new department, each department is capable of better communications and coordination with each other. The major considerations of adopting this new organization are:

1. The one-on-one relationship of the Plant Superintendent/Assistant Plant Superintendent is eliminated. These two positions have recently been changed to Plant General Manager and Assistant General Manager. The General Manager title would be retained.

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2. The organization is functionally divided into three separate departments: Operations & Maintenance, Technical Services, and Plant Services. Each of these departments would be headed by a Department Manager reporting to the General Manager.
3. The General Manager and Department Managers directly supervising only three or four people each will greatly streamline communications and coordination within and between departments.
4. Top management (Department Managers) will be more accountable for activities in their functional areas than is presently possible with the large number of supervisors reporting directly to the Assistant Plant Superintendent. Adding two second-level positions strengthens the management by increasing the degree of direct responsibility placed on the second-level managers. This is done without increasing the number of levels of management between the supervisor of any activity and the Plant General Manager.
5. The number of management people involved in the Plant decision-making process will be reduced with this organization. Decisions affecting one functional area can be made by the Department Manager and his staff and those affecting more than one functional area can be made by the General Manager and the affected Department Managers.
6. The Instrument & Control organization which is basically oriented toward maintenance and surveillance activities will be part of the Operations & Maintenance organization.
7. The stores and warehousing activities which are administrative in nature will become part of the Plant Services Department. This will free the Maintenance Supervisor of a major responsibility not directly related to his prime responsibility.
8. A one-on-one situation in the Engineering group will be eliminated. Presently, all of the Plant engineers, except the Reactor Engineer, report to the Chief Nuclear Plant Engineer who in turn reports to the Engineering Supervisor. This is presently necessary since the Engineering Supervisor is also responsible for the Chemistry and the Instrument and Control activities. In the new organization, the Engineering Supervisor will be responsible only for engineering and the Chief Nuclear Plant Engineer position will be eliminated.

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9. This change will facilitate a badly needed restructuring of the Plant Review Board. The present makeup of the Plant Review Board includes all of the top management people. Lengthy deliberations of the Board result in all of the top management being unavailable at one time which can interfere with the other management functions. The proposed new organization includes a proposed new structure for the Plant Review Board. The Board would include most of the same members, and all of the disciplines included in the present Board, but only the Technical Services Manager from top management. This will streamline the operation of this Board. The Radiation Protection Supervisor is added as a member of the Plant Review Board to ensure that radiation protection areas of concern are adequately reviewed in accordance with the PGE commitment to ALARA.
10. There are presently many situations which require interface with offsite organizations and which should be handled by the Plant General Manager or Department Managers. With the present organization, there is very limited capability for involving senior management in these communications. Having four senior managers on the staff instead of two (the Superintendent and Assistant Superintendent), and with each of these Department Managers having specific areas of responsibility, such communication will be greatly simplified.
11. Coordination with the Security Supervisor and the Safety Coordinator will be handled by those Department Managers responsible for that functional area. This will improve coordination with the outside organizations.

SAFETY EVALUATION

The proposed changes strengthen PGE corporate and Trojan Nuclear Plant operating organizations and make them more efficient. The new organizations continue to meet all of the requirements specified in the initial Trojan Nuclear Plant FOL. Furthermore, these changes are in accordance with the Trojan Nuclear Plant Safety Evaluation Report (SER) and ANSI-18.7-1976. The assignment of responsibilities and technical qualifications of persons performing safety-related work remain the same except for the position of the Trojan Safety Coordinator who is now responsible for Trojan Fire Protection and other safety programs.

The combining of the Environmental Sciences and Analytical Services Departments under the Assistant Vice President allows for improved coordination of these services. Appropriate positions from these two departments were reoriented into an Environmental Field Operation Branch

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providing each organizational unit within this division a more homogeneous structure. No changes are made in the qualifications for any of the positions in these departments. This change will increase the efficiency of these departments and is relatively minor in nature.

The change in title to General Manager, Purchasing Department, and change in reporting relationship does not change the responsibilities and functions of the Purchasing Department concerning safety-related activities. Technical qualifications and the manner by which their safety-related functions are carried out remain unchanged.

The creation of the Trojan Safety Coordinator position, reporting to PGE Industrial Relations, is made to separate the Plant security and safety functions and responsibilities. By having one person responsible for each activity allows for an improvement in concentration of each individual on their respective responsibilities. The requirements of each activity have increased to the point that it is more efficient to separate them.

The position of Director, Corporate Security, is created to manage corporate security and administer Trojan and other nuclear plant security programs. This individual will be responsible for interfacing with regulatory agencies and the Plant Security Supervisor. He will be responsible for training of nuclear plant security personnel and coordinating security efforts and activities of all nuclear plants owned and/or operated by PGE. This position will improve the efficiency of nuclear plant security without making any changes to the technical qualifications of any security positions.

The elimination of the General Manager, Trojan Nuclear Plant (Trojan Plant Superintendent) and the Director of the Analytical Laboratory from the NOB is consistent with the Trojan SER and ANSI-18.7-1976. The necessary levels of expertise required for independent review and audit by Specification 6.5.2.1 are still available. It is not felt that there is a decrease in safety margin or an increase in the risk to public health and safety as a result of these changes.

The restructuring of the Trojan operating organization provides better communications and control. The management efficiency is enhanced by having only three Managers report to the General Manager and having only three or four Supervisors report to each Manager. No Supervisors in the presently approved organization are any further removed from the General Manager in the new organization. The responsibilities and duties of each position remain the same; there is no change in safety-related functions.

The membership of the Plant Review Board essentially remains the same with the exception of the addition of the Radiation Protection Supervisor. The General Manager is removed but, since he has final approval, his authority and responsibilities remain unchanged. The Plant Review Board becomes more

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of an advisory body to the General Manager but has no change in authority or responsibility. There becomes less of a conflict between managing and reviewing management action for the Managers and Supervisors. This change does not result in an increased risk to the health or safety of the public, nor is there a decrease in safety margin.

Some of these changes are to titles only, with no changes to functions, responsibilities, or technical qualifications of the positions involved. These changes are for the Manager, Generation Licensing & Analysis; Manager, Fuel Operations. Since no changes other than titles are made, there are no changes to the original safety evaluation of the PGE and Trojan facility organizations. The change in the title of NOB member previously identified as "Manager, Environmental Services" is due to the reorganization of that Department under the Assistant Vice President as identified above.

Based upon the above discussion, there are no unreviewed safety questions in this License Change Request; no new accidents are created and the probability and consequences of accidents previously analyzed remains unchanged. No environmental or socioeconomic impacts result from these organizational changes.

SCHEDULE CONSIDERATIONS

To facilitate personnel assignments, we request expedited review and approval of these changes.

BASIS FOR DETERMINATION OF AMENDMENT CLASS

This LCR has been reviewed and evaluated to be a Class II amendment, requiring a fee of \$1200. This LCR should result in an amendment that is "pro forma, administrative in nature", and has "no safety or environmental significance".



## 6.0 ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

6.1.1 The General Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

### 6.2 ORGANIZATION

#### OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

#### FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. All CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.

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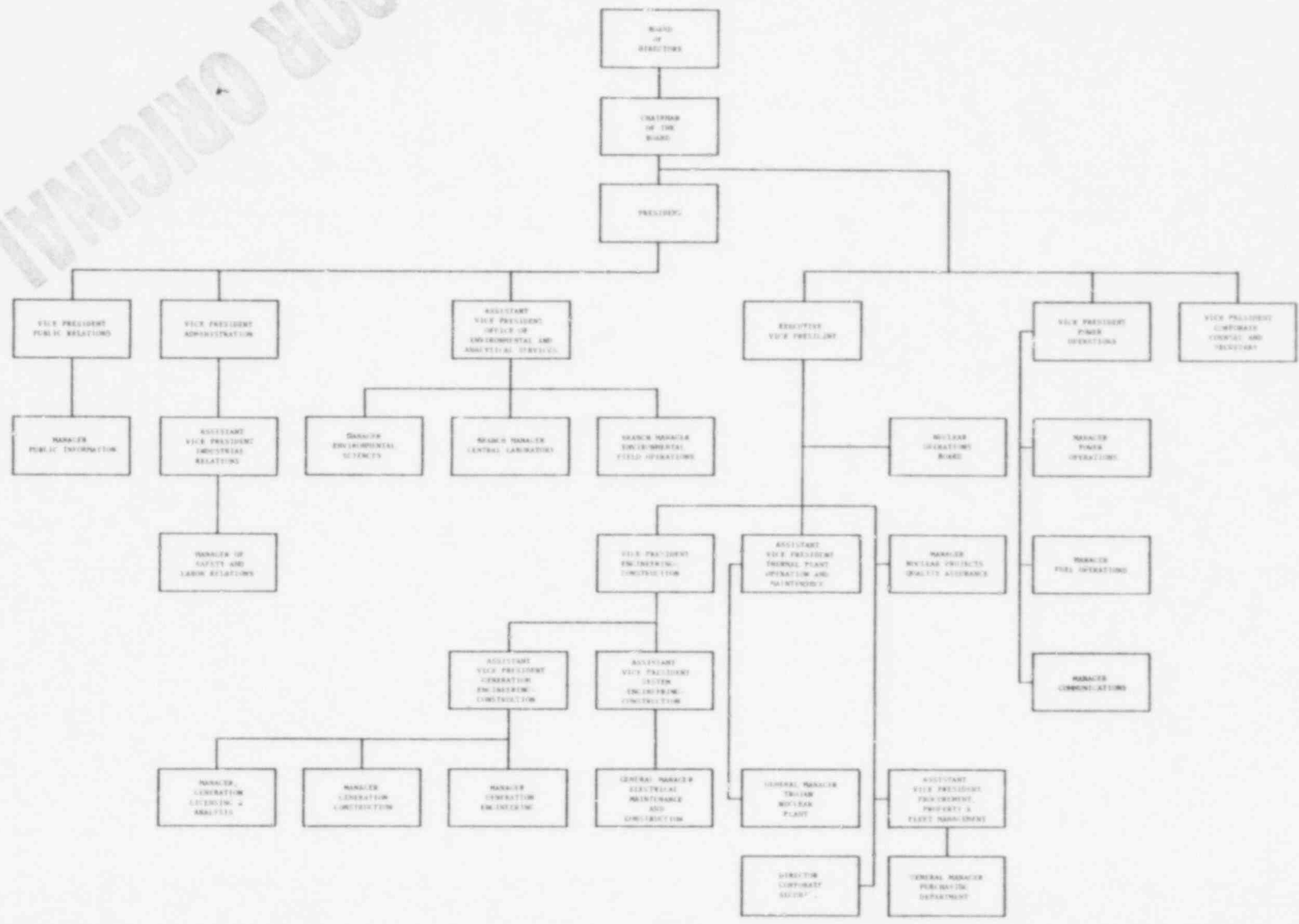


Figure 6.2-1 Offsite Organization for Facility Management and Technical Support



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6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the Radiation Protection Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.



6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the General Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the General Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975, except for Fire Brigade training sessions which shall be held at least quarterly.



6.5 REVIEW AND AUDIT

6.5.1 PLANT REVIEW BOARD (PRB)

FUNCTION

6.5.1.1 The Plant Review Board shall function to advise the General Manager on all matters related to nuclear safety.

## ADMINISTRATIVE CONTROLS

### COMPOSITION

6.5.1.2 The Plant Review Board shall be composed of the:

|           |                                 |
|-----------|---------------------------------|
| Chairman: | Manager, Technical Services     |
| Member:   | Engineering Supervisor          |
| Member:   | Maintenance Supervisor          |
| Member:   | Operations Supervisor           |
| Member:   | Quality Assurance Supervisor    |
| Member:   | Radiation Protection Supervisor |

### ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PRB activities at any one time.

### MEETING FREQUENCY

6.4.1.4 The PRB shall meet at least once per calendar month and as convened by the PRB Chairman or his designated alternate.

### QUORUM

6.5.1.5 A quorum of the PRB shall consist of the Chairman or his designated alternate and at least four members including alternates.

### RESPONSIBILITIES

6.5.1.6 The Plant Review Board shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the General Manager to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.

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- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Executive Vice President and to the Chairman of the Nuclear Operations Board. △ 12 |
- f. Review of those REPORTABLE OCCURRENCES requiring 24 hour notification of the Commission.
- g. Review of facility operations to detect potential safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Nuclear Operations Board.
- i. Review of the Plant Security Plan and implementing procedures and shall submit recommended changes to Chairman of the Nuclear Operations Board.
- j. Review of the Emergency Plan and implementing procedures and shall submit recommended changes to the Chairman of the Nuclear Operations Board.

AUTHORITY

6.5.1.7 The Plant Review Board shall:

- a. Recommend to the General Manager written approval or disapproval of items considered under 6.5.1.6(a) through (d) above. |
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Executive Vice President and the Nuclear Operations Board of disagreement between the PRB and the General Manager; however, the General Manager shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above. △ 12 |

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COMPOSITION

6.5.2.2 The NOB shall be composed of the:

|           |   |         |
|-----------|---|---------|
| Chairman: | Assistant Vice President, Thermal Plant<br>Operation and Maintenance            | △<br>12 |
| Member:   | Designated Mechanical Engineer, Generation<br>Engineering                       |         |
| Member:   | Designated Electrical Engineer, Generation<br>Engineering                       |         |
| Member:   | Designated Nuclear Engineer, Generation<br>Licensing & Analysis                 |         |
| Member:   | Manager of Nuclear Projects Quality Assurance                                   |         |
| Member:   | Designated Representative of Office of<br>Environmental and Analytical Services |         |
| Member:   | Environmental Services Health Physicist   |         |

Designated members shall be appointed in writing by the Executive Vice President.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the Executive Vice President to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NOB activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NOB Chairman to provide expert advice to the NOB.

MEETING FREQUENCY

6.4.2.5 The NOB shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once per six months thereafter.

QUORUM

6.5.2.6 A quorum of NOB shall consist of the Chairman or his designated alternate and at least three members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the facility.

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6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The facility shall be placed in at least HOT STANDBY within one hour.
- b. The Safety Limit violation shall be reported to the Commission, the Executive Vice President and to the NOB within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PRB. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the NOB and the Executive Vice President within 14 days of the violation.

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6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, November, 1972.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Radiological Emergency Response Plan implementation.
- f. Fire Protection Program implementation.

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6.8.2 Each procedure and administrative policy of 6.8.1 above, and changes thereto, shall be reviewed by the PRB and approved by the General Manager prior to implementation and reviewed periodically as set forth in administrative procedures.



## ADMINISTRATIVE CONTROLS

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the PRB and approved by the General Manager within 14 days of implementation.

## 6.9 REPORTING REQUIREMENTS

### ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement unless otherwise noted.

### STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial

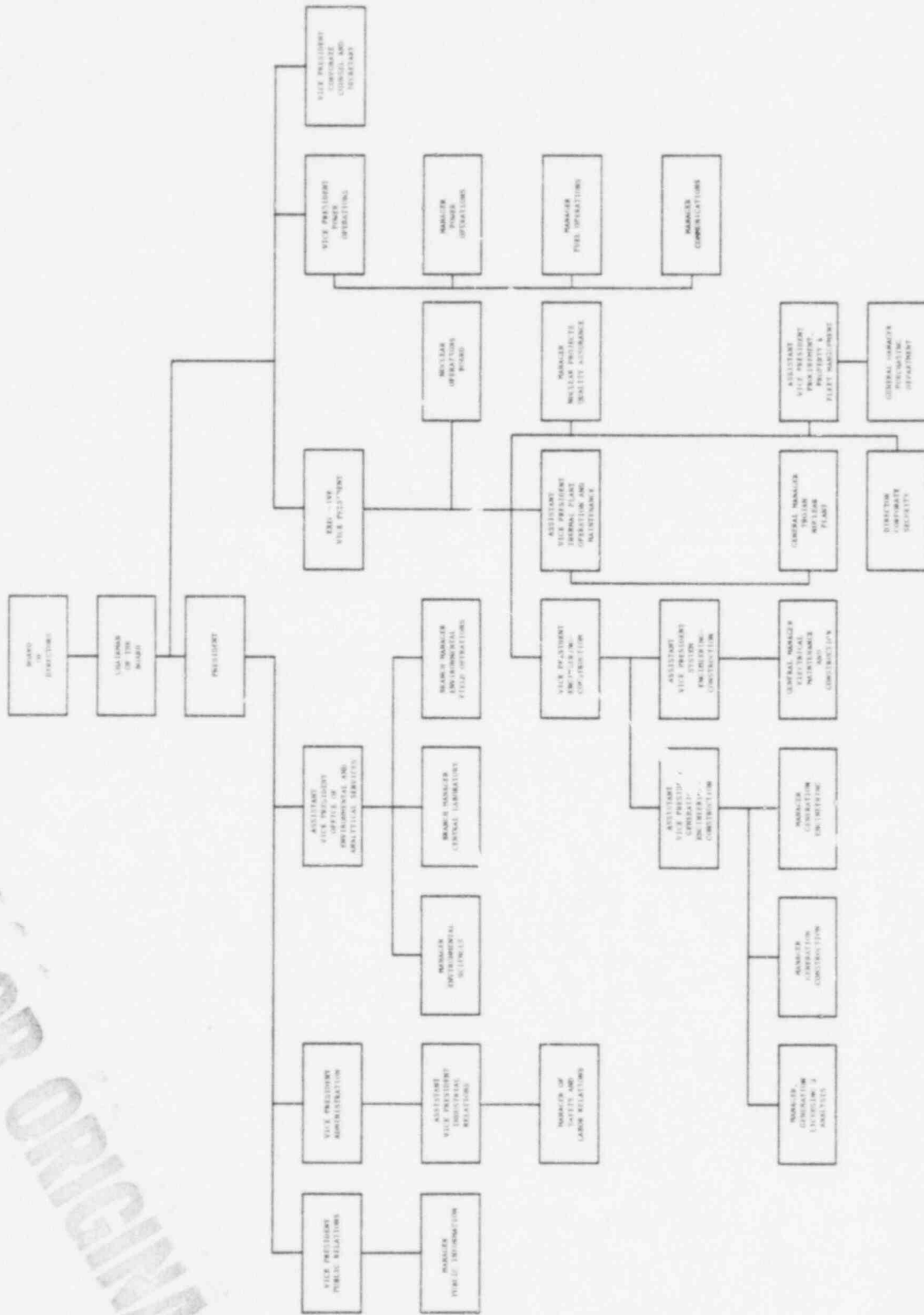


Figure 5.1 PGE Trojan Management Organization

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