PORTLAND GENERAL ELECTRIC COMPANY EUGENE WATER & ELECTRIC BOARD AND PACIFIC POWER & LIGHT COMMANY

Operating License NPF-1 Docket 50-344 License Change Application 184

This License Change Application requests modifications to Operating License NPF-1 for the Trojan Nuclear Plant to revise the Trojan Technical Specifications to show that the Radiation Protection Branch Manager must meet Regulatory Guide 1.8, Revision 2, April 1987 guidance in lieu of the September 1975 issuance of that guide.

PORTLAND GENERAL ELECTRIC COMPANY

T. D. Walt General Manager

Acting for Vice President, Nuclear Subscribed and sworn to before me this 20th day of October 1989.

Notary Public of Oregon

Technical Functions

My Commission Expires:

3-12-90

Description of Change

The proposed change will revise Trojan Technical Specification (TTS) 6.3.1, "Facility Staff Qualifications", from requiring that the Radiation Protection Branch Manager meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 to requiring that the manager meet or exceed the qualifications of Regulatory Guide 1.8, "Personnel Selection and Training," Revision 2, April 1987.

Reason for Change

The change reflects current nuclear industry standards' recommendations, and Nuclear Regulatory Commission (NRC) Regulatory Guide (RG) requirements. American National Standards Institute/American Nuclear Society (ANSI/ANS)-3.1-1981, "Selection and Training of Nuclear Power Plant Personnel", (endorsed by RG 1.8, Revision 2, April 1987) requires a minimum of four years working experience for Radiation Protection Branch Manager versus the five-year requirement of ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel", (endorsed by RG 1.8, September 1975).

Determination of Significant Hazards Consideration

In accordance with the requirements of Title 10, Code of Federal Regulations, Part 50.92, "Issuance of Amendment", this License Change Request (LCR) is judged to involve no significant hazards based upon the following information:

1. Does the proposed license change involve a significant increase in the probability or consequences of an accident?

The proposed change will not increase the probability or consequences of an accident previously evaluated because it conforms to current regulatory requirements, in addition it does not require hardware or procedural changes to the Plant.

The Radiation Protection Branch Manager will meet current regulatory requirements and as such that individual will be fully qualified to perform his/her duties in a safe and reliable manner.

Does the proposed license change create the possibility of a new or different kind of accident from any accident previously analyzed?

This change does not introduce any new equipment or methods into Plant operation and conforms to current regulatory requirements; so consequently, it cannot create an accident of a different type.

3. Does the proposed license change involve a significant reduction in a margin of safety? Because the proposed change is administrative in nature and conforms to current regulatory requirements, safety margins remain unaffected.

In the March 6, 1986 Federal Register, the NRC published a list of examples of amendments that are not likely to involve a significant hazards consideration. Example (vii) from this list states:

"A change to conform a license to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations".

The proposed change reflects current nuclear industry standards' recommendations and NFC RG requirements, and as such, it is similar to Example (vii) discussed above and does not involve a significant hazard consideration.

Safety/Environmental Evaluation

Safety and environmental evaluations were performed as required by Title 10, Code of Federal Regulations, Part 50 and the TTS. The review determined that the proposed change does not create an unreviewed safety question, nor does it create an unreviewed environmental question.

Schedule Considerations

It is requested that the effective date of the amendment be 30 days after issuance by the NRC.