Docket No. 50-344

Portland General Electric Company 121 S.W. Salmon Street TB-17 Portland, Oregon 92704

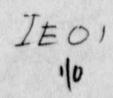
Attention: Mr. David W. Cockfield

Vice President, Nuclear

SUBJECT: RESOLUTION TO OUTSTANDING APPENDIX R COMPLIANCE ISSUES

In your April 28, 1989 submittal to NRC Region V, you described your resolution to fourteen issues that were identified by the NRC during the August 22-26, 1988 followup Appendix R inspection at Trojan. Based on our review of your April 28, 1989 submittal, we find that eight of the fourteen issues were not satisfactorily addresses; however, as conveyed to you in our telephone discussion with your staff (T. Walt and others) of September 25, 1989, six of the fourteen issues have not been adequately addressed. The specific NRC concerns, as we discussed with you on September 25, are as follows:

- The revised Trojan methodology fails to substantiate a basis for the reduction of a previous self-initiated 40 minute station blackout to a 5 minute self-initiated station blackout. A multiple high impedance fault analysis was not performed to arrive at this timeline.
- 2. The revised Trojan methodology forces the plant onto the emergency diesel generators regardless of whether offsite power is available.
- The revised Trojan methodology appears to make inappropriate assumptions regarding fire effects and failure modes of PORV's and PORV block valves.
- 4. The revised Trojan methodology appears to make inappropriate assumptions regarding fire effects and failure modes of motor operated valves at hi-low pressure interface boundaries.
- 5. The revised Trojan methodology fails to se tantiate a basis for the assumption that support systems for the en gency diesel generators remain unaffected during a cable spreading room or control room fire.
- The revised (rojan methodology fails to provide a basis for the acceptability for a 9 minute loss of process diagnostic instrumentation on the Bailey instrument network.



6911020298 891024 PDR ADDCK 05000344 Q PNU On September 29, 1989, members of your staff informed us that you would make a two part submittal to the NRC, revising your approach to the resolution of these six issues. According to your staff, the first submittal will address all issues except for the multiple high impedance fault concern, and will be submitted by November 30, 1989. The second submittal will address the multiple high impedance fault concern, in a manner similar to that accepted by the NRC staff for San Onofre. The NRC is concerned that the design characteristics of Trojan's electrical distribution system are sufficiently different from San Onofre that the approach may not be acceptable for Trojan.

Your April 28, 1988 submittal indicated that plant modifications and other corrective actions would be completed by September 30, 1989. However, based on our technical review of your April 28, 1988 submittal, this date of expected compliance with Appendix R requirements appears to be no longer valid, since your proposed approach to compliance is not entirely acceptable.

We consider that timely resolution of this matter requires your immediate attention and we request that you advise us in your November 30, 1989 response of how and when you plan to achieve full compliance with Appendix R.

If your staff has further questions regarding this matter, please contact Mr. F.R. Hugy in the Region V office.

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Roy P. Zimmerman, Director Division of Reactor Safety and Projects

bcc: docket file copy Resident Inspector Project Inspector B. Faulkenberry J. Martin M. Smith G. Cook

REGION V

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SEND TO PDR YES / NO On September 29, 1989, members of your staff informed us that you would make a two part submittal to the NRC, revising your approach to the resolution of these six issues. According to your staff, the first submittal will address all issues except for the multiple high impedance fault concern, and will be submitted by November 30, 1989. The second submittal will address the multiple high impedance fault concern, in a manner similar to that accepted by the NRC staff for San Onofre. The NRC is concerned that the design characteristics of Trojan's electrical distribution system are sufficiently different from San Onofre that the approach may not be acceptable for Trojan.

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Roy P. Zimmerman, Acting Director Division of Reactor Safety and Projects

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