

October 24, 1989

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:

1. 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.
3. 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 substantiate a basis for the assumption that support systems for the emergency diesel generators remain unaffected during a cable spreading room or control room fire.
6. The revised Trojan methodology fails to provide a basis for the acceptability for a 9 minute loss of process diagnostic instrumentation on the Bailey instrument network.

IEO1  
1/0

October 24, 1989

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. Huey in the Region V office.

151

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  
CRamsey            RHuey            AChaffee            DKirsch  
10/ /89            10/ /89            10/ /89            10/ /89

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
YES / NO	YES / NO	YES / NO	YES / NO

SEND TO PDR
YES / NO

October 24, 1989

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 you have further questions regarding this matter, please contact Mr. F.R. Huey of my staff.

151

Roy P. Zimmerman, Acting 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  
CRamsey  
10/19/89

*dh*  
RHuey  
10/19/89

*ala*  
AChaffee  
10/20/89

*ELS SKY DL*  
DKirsch  
10/19/89

*M*  
Mendon  
10/19/89  
yes

*M per table*  
Beverly  
Rood for  
Kongler  
10/18/89  
yes

REQUEST COPY <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO	REQUEST COPY <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO	REQUEST COPY <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO	REQUEST COPY <input type="checkbox"/> YES / <input type="checkbox"/> NO
			SEND TO PDR <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO

*RPZ*  
10/20/89  
yes

*Kobicki*  
Carmel  
10/19/89  
yes