



Portland General Electric Company

David W. Cockfield Vice President, Nuclear

October 31, 1989

Trojan Nuclear Plant
Docket 50-344
License NPF-1

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington DC 20555

Dear Sirs:

Portland General Electric Company (PGE) Response
to Nuclear Regulatory Commission (NRC) Request for
Additional Information Regarding Generic Letter 83-28

By letter dated November 4, 1983, PGE provided a response to Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events". The NRC raised several questions pertaining to Item 2.2.1 of Generic Letter 83-28 and sent these to PGE on September 8, 1989. The attachment to this letter provides PGE responses to the NRC request for additional information.

Sincerely,

Tim Walst for

Attachment

c: Mr. John B. Martin
Regional Administrator, Region V
U.S. Nuclear Regulatory Commission

Mr. David Stewart-Smith
State of Oregon
Department of Energy

Mr. R. C. Barr
NRC Resident Inspector
Trojan Nuclear Plant

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PORTLAND GENERAL ELECTRIC COMPANY (PGE)
RESPONSE TO NUCLEAR REGULATORY COMMISSION (NRC)
REQUEST FOR ADDITIONAL INFORMATION ON GENERIC LETTER 83-28

1. NRC Request (Subitem 2.2.1.2):

The Licensee's response states that their information handling system consists of hard-copy documents which are lists. Several questions were identified:

- a. Does the key document list only systems, or does it also list components?
- b. Does the key document direct the users to the subordinate design documents for additional information on the component?
- c. Do the subordinate documents overlap each other and the key document; i.e., can the same component appear on different lists with different safety classifications?
- d. Do the two identified procedures, Nuclear Plant Engineering Procedure (NPEP) 200-13 and NPEP 200-15, have equivalent requirements for maintaining, verifying, approving, and modifying the stated lists?
- e. What organizations are responsible for maintaining and controlling these identified lists; i.e., how is it assured that these various lists are controlled and maintained such that they function together as a single, consistent, and unambiguous source of classification information for safety-related components?

PGE Response

- a. The hard-copy document described in PGE'S original response has been partially replaced by a computerized listing of safety-related components. The new listing is referred to as the Safety-Related List and contains over 8,000 individual mechanical and electrical components that have been evaluated as being safety-related. PGE continues to use hard-copy listings for some specific groups of components such as piping, pipe supports, cable tray supports, and Plant structures. Nuclear Division Procedure (NDP) 200-8, "Safety-Related List", establishes the requirements for the preparation, review, approval, revision, and administration of the listing of safety-related components.

- b. The Safety-Related List contains an individual component classification form for each component that provides an evaluation of the functional requirements for the component. The classification form also provides references to the applicable drawing for the component.
 - c. There are still subordinate documents in existence which may overlap each other and the key document. The same component may appear on more than one listing and cases have been noted where the safety classification is different on the different listings. Nevertheless, NDP 200-8 applies to the entire Nuclear Division and all support organizations engaged in quality-related activities for the Trojan Nuclear Plant. This procedure requires that the SR-List take precedence over departmental procedures, other lists, or drawings and is the definitive authority regarding whether an item is a safety-related component. To avoid possible conflicts between subordinate documents and the SR-List, PGE will conform all subordinate documents to the SR-List by December 31, 1990.
 - d. Procedure NPEP 200-13, "Control of Quality-Related Lists", has been replaced by NDP 200-8. Procedure NPEP 200-15, "Processing of 'As-Built' Packages", does not contain specific instructions regarding the Safety-Related List but does direct personnel to update the listing.
 - e. The Nuclear Plant Engineering (NPE) Department is responsible for maintaining and controlling all the hard-copy listings. The Safety-Related List is maintained by the Nuclear Safety & Regulation Department (NSRD). The evaluation of components is performed by the NPE Department and submitted to NSRD for inclusion into the listing. The NPE Department has control of the evaluation of all components and is responsible for ensuring that the various lists providing classification information are consistent.
2. NRC Request (Subitem 2.2.1.3):

Please provide additional information on how the equipment classification lists are used by the station personnel such as: Do work authorization procedures require station personnel to consult the lists to verify or determine the classification when preparing work requests, modification requests, engineering change notices, and engineering test requests?

PGE Response

Plant procedures require personnel to determine if replacement parts or work activities are safety-related. The procedures for the

following activities require that the personnel performing the activity determine if the work involves safety-related equipment, components, or services:

- a. NDP 200-1, "Design Change Control", which controls modifications to plant systems, structures, and components.
- b. NDP 200-2, "Plant Configuration Changes", which controls minor modifications to the plant.
- c. Administrative Order AO-3-9, "Maintenance Requests", which controls all work on plant systems, structures, and components, including all maintenance, replacement, modification, and repair work.
- d. Administrative Order AO-5-3, "Spare Part Equivalency Evaluation Reports", which controls the replacement of parts with equivalent parts.
- e. Administrative Order AO-5-4, "Plant Setpoint Changes", which controls changes to instrument setpoints in all systems in the Plant.
- f. Administrative Order AO-5-8, "Temporary Modifications", which controls the installation, tracking, and removal of temporary systems or temporary changes to existing systems in the Plant.
- g. NDP 300-1, "Material Engineering Evaluations and Procurement Quality Level Classification System", which controls the determination of quality requirements for procurement of materials, parts, and services.
- h. NDP 300-3, "Evaluation of Commercial-Grade Items", which controls the documentation of engineering evaluations of commercial-grade items used in safety-related applications.
- i. NDP 300-4, "Procurement Document Preparation, Review, and Change Control", which controls the requirements and process for procuring items or services for use in quality-related applications.

These procedures direct the user to determine whether an item is safety-related and in many cases refer directly to the Safety-Related List as a source document. Otherwise, the individual uses his knowledge and training to consult the appropriate source document.

The Safety-Related List is computerized and is available on a computer network outside the protected area and is available inside the protected area via modem links for the Maintenance, Plant Modifications, Quality Assurance, Operations and Plant Systems Engineering Departments.