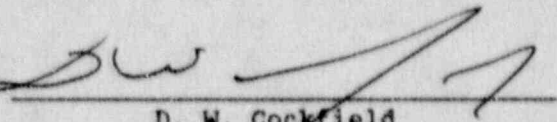


PORTLAND GENERAL ELECTRIC COMPANY
EUGENE WATER & ELECTRIC BOARD
AND
PACIFIC POWER & LIGHT COMPANY

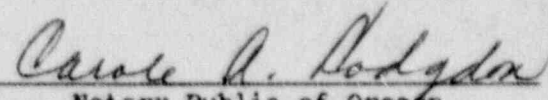
Operating License NPF-1
Docket 50-344
License Change Application 172, Revision 1

This License Change Application requests modifications to Operating License NPF-1 for the Trojan Nuclear Plant to revise the surveillance requirements for Containment leak testing to make Trojan Technical Specification (TTS) 4.0.2, "Applicability", not applicable. The revision describes more precisely the present inconsistencies between TTS sections.

PORTLAND GENERAL ELECTRIC COMPANY

By 
D. W. Cockfield
Vice President
Nuclear

Subscribed and sworn to before me this 25th day of October 1989.


Notary Public of Oregon

My Commission Expires:

August 9, 1991



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Description of Change

Trojan Technical Specification (TTS) 3/4.6.1.2, "Containment Leakage" is revised to add the following sentence:

"h. The provisions of Specification 4.0.2 are not applicable."

Reason for Change

Trojan Technical Specification (TTS) 3/4.6.1.2 requires that an "Integrated Leak Rate Test (ILRT)" be performed at 40 ± 10 -month intervals. TTS 4.0.2 requires that each surveillance be performed with a total maximum time interval for any three consecutive surveillance intervals not to exceed 3.25 times the surveillance interval. As discussed below, these two TTS can conflict with each other.

Three ILRTs could be performed at 49-month intervals, each which would clearly satisfy the 40 ± 10 -month interval of TTS 3/4.6.1.2. However, this would not satisfy the TTS 4.0.2 requirement of performing three surveillances within 3.25 times the interval ($40 \text{ months} \times 3.25 = 130$ months allowed, whereas $49 \text{ months actual} \times 3 = 147$ months). To resolve this conflict, TTS 3/4.6.1.2 is being revised to make TTS 4.0.2 not applicable.

This change is consistent with the Westinghouse Standard Technical Specifications (NUREG-0452, Revision 4).

Significant Hazards Consideration Determination

The proposed change does not pose a significant hazard for the reasons discussed below.

1. Making TTS 4.0.2 not applicable to TTS 3/4.6.1.2 does not:
 - a. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The Containment structure is designed to mitigate the consequences of an accident and is not related to accident probability. Periodic leak testing of the Containment is performed to provide assurance of Containment integrity. The frequency of this leak testing is specified in TTS 3/4.6.1.2 as 40 ± 10 months. No change is proposed to the test frequency, test methods, or acceptance criteria.

TTS 4.0.2 is provided to specify an acceptable tolerance for performance of TTS surveillances in general. Since a tolerance of ± 10 months is already specified in TTS 3/4.6.1.2, the surveillance interval tolerance allowed in TTS 4.0.2 is unnecessary and may conflict with TTS 3/4.6.1.2 when applied over three successive test intervals.

- b. Create the possibility of a new or different kind of accident from any previously evaluated.

The change proposed is an administrative change that does not alter the test frequency, test methods or acceptance criteria. This change is merely a clarification that is not related to accident creation.

- c. Involve a significant reduction in a margin of safety.

As required by Title 10, Code of Federal Regulations, Part 50 (10 CFR 50), Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors", three ILRTs are to be performed at approximately equal intervals during each 10-year (120 month) service period. This regulation has been implemented in the TTS by specifying that ILRTs be performed at 40 ± 10 -month intervals. This surveillance frequency is identical to the Westinghouse Standard Technical Specifications. By making TTS 4.0.2 not applicable to TTS 3/4.6.1.2, the conflict discussed above between these two TTS will be eliminated. This change will also bring the TTS into conformance with the Westinghouse Standard Technical Specifications.

No change is proposed in the ILRT frequency, method, or acceptance criteria.

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 No. 1 from this list states:

"A purely administrative change to Technical Specifications, e.g., a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature."

This example applies to the change proposed herein.

Based on the above evaluation, this change does not pose a significant hazard.

Safety/Environmental Evaluation

Safety and environmental evaluations were performed as required by 10 CFR 50 and the TTS. This review determined that the proposed change does not create an unreviewed safety question, nor does it create an unreviewed environmental question.

Schedule Consideration

It is requested that the effective date of this amendment be 30 days after issuance by the Nuclear Regulatory Commission.

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