



Portland General Electric Company

Charles Goodwin, Jr. Assistant Vice President

August 8, 1980

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Portland General Electric Company (PGE) provides the following response to your letter of June 17, 1980 concerning a postulated Fuel Handling Accident Inside Containment (FHAIC). The NRC Safety Evaluation of the FHAIC attached to your letter of June 17, 1980 concluded that equipment modifications and/or Technical Specification changes are required at the Trojan Nuclear Plant to provide assurance that the limits of 10 CFR 100 are not exceeded following an FHAIC. PGE believes that the NRC Safety Evaluation utilizes overly conservative assumptions and models which greatly overpredict the activity released and subsequent offsite doses as a result of an FHAIC.

Specifically, PGE still contends that the fuel gap activities are overestimated in Regulatory Guide 1.25 by at least an order of magnitude and that thermal convection in the refueling cavity would greatly reduce the activity released to the atmosphere. These contentions were substantiated by analyses, tests and scientific literature submitted to the NRC by letters on January 10, 1977, March 7, 1977, October 19, 1977, October 7, 1978 and November 2, 1978.

PGE also believes that the NRC Safety Evaluation insufficiently addressed the effect of an area radiation monitor located on the refueling cavity manipulator crane. An area radiation monitor, with Containment isolation capability, located on the crane, would detect rising radiation levels prior to the activity escaping from the refueling cavity water. Sufficient time would be provided to prevent escape of all or part of the activity from the Containment.

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Portland General Electric Company

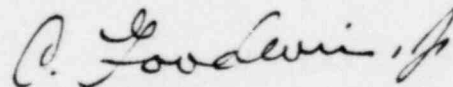
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PGE also believes that a fuel handling accident over the reactor core involving more than one fuel assembly would not significantly increase offsite doses because of the increased mixing volume above the refueling cavity if the accident occurred in the core area. Additionally, the velocity of air over the refueling cavity from the refueling pool exhaust system is minimal over the core area.

While PGE does not agree with the above overconservative assumptions and models used in the NRC Safety Evaluation, PGE has decided to not further contest the Safety Evaluation at this time. The NRC letter of June 17, 1980 required PGE to submit a License Change Application (LCA) incorporating one of three options. Accordingly, PGE selects Option 3 which will restrict Containment purge/exhaust fan operation during actual fuel movement inside Containment for the first 285 hr. following reactor shutdown. An LCA incorporating the above requirement will be forwarded to you as soon as possible. The above restriction will be implemented prior to the next refueling shutdown currently scheduled for spring 1981.

Please contact me if questions arise on this matter.

Sincerely,



C. Goodwin, Jr.
Assistant Vice President
Thermal Plant Operation and
Maintenance

CG/JWL/MQH/4mg3A10

c: Mr. Lynn Frank, Director
State of Oregon
Department of Energy