

APPENDIX A

NOTICE OF VIOLATION

Portland General Electric Company  
Trojan Nuclear Plant

Docket No. 50-344  
License No. NPF-1

During an NRC inspection conducted from October 16 through October 20, 1989, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion V, states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances ...."

Licensee quality related procedure EFP-2, "Alternative Shutdown for Complete Loss of Service Water Caused by Fire," Revision 3, prescribes specific steps for maintaining a supply of Service Water to affected safety related components in the event of the loss of normal Service Water during a fire.

Contrary to the above, at the time of the inspection, Procedure EFP-2 was not appropriate to the circumstances in that the procedure did not prescribe:

1. The location where dedicated hoses were stored.
2. The required size of the hoses.
3. The required length of the hoses.

This is a Severity Level IV violation (Supplement I).

- B. 10 CFR Part 50, Appendix B, Criterion V, states, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, .... shall be accomplished in accordance with these instructions, procedures, or drawings...."

Trojan Nuclear Safety and Regulation Procedure, "Quality-Related Calculation," Revision 1, Section 5.a, effective at the time of Revision 1 of Calculation TNP-83-59, states, "Check hand calculations for assumptions, analytical methods, mathematical accuracy, completeness, and - as appropriate - compliance with design criteria and/or design drawings. (See Form NSR-25, Attachment D.)".

Form NSR-25, "Calculation General Checking Criteria," requires, for hand calculations, determinations that all assumptions are correct, and that calculational parameters comply with design criteria and dimensions.

Contrary to the above, at the time of the inspection, Calculation

TNP-83-59, Revision 1, "Fire Pump Flow Capability for Appendix R Alternate Cooldown Without Service Water System Pumps and Offsite Power," failed to assure the adequacy of the assumption that a 50-foot hose would be used to connect the fire pump discharge header and the Service Water System. In fact, a 100-foot hose would have been used under the conditions to which the calculations applied.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Portland General Electric Company is hereby required to submit a written statement of explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington DC 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Senior Resident Inspector, Trojan, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

  
D. F. Kirsch, Chief  
Reactor Safety Branch

Dated at Walnut Creek, California  
this 21 day of November, 1989