

NOV 29 1989

Docket No. 50-344

Portland General Electric Company  
121 SW Salmon Street, TB-17  
Portland, Oregon 97204

Attention: Mr. David W. Cockfield  
Vice President, Nuclear

Thank you for your letter of October 30, 1989, in response to our Notice of Violation and Inspection Report No. 50-344/89-20, dated September 29, 1989. We appreciate you informing us that the violation was against Trojan Technical Specification 4.1.3.2 instead of 4.1.3.1.1. Also, we appreciate you informing us of the steps you have taken to correct the items which we brought to your attention regardless of Technical Specification section violation. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

*orig signed*  
A. E. Chaffee, Acting Chief  
Reactor Projects Branch

bcc w/copy of letter dated 10/30/89:  
docket file  
State of Oregon  
A. Johnson  
G. Cook  
B. Faulkenberry  
J. Martin  
Resident Inspector  
Project Inspector  
J. Zollicoffer  
M. Smith

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MMendonca AEChaffee  
11/1/89 11/29/89

REQUEST COPY	REQUEST COPY
YES / NO	YES / NO

  

SEND TO PDR
YES / NO

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Portland General Electric Company

David W. Cockfield Vice President, Nuclear

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October 30, 1989

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

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

Dear Sir:

Reply to a Notice of Violation

Your letter of September 29, 1989 transmitted a Notice of Violation associated with Nuclear Regulatory Commission (NRC) Inspection Report 50-344/89-20. Attachment 1 is our response to that Notice of Violation.

Sincerely,

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

~~89-000521~~  
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REPLY TO A NOTICE OF VIOLATION

Violation

Trojan Technical Specification (TTS) Surveillance Requirement 4.1.3.1.1 states "The position of each rod shall be determined to be within the group demand limit by verifying the individual rod positions at least once per 12 hours except during time intervals when the Rod Position Deviation Monitor is inoperable, then verify the group positions at least once per 4 hours."

Contrary to above, from July 16, 1989, through August 1, 1989, while the reactor was in Mode 1 or Mode 2 with the Rod Position Deviation Monitor inoperable, the position of each rod was not determined to be within the group demand limit by verifying the individual rod positions at least once per 4 hours; rather the rod positions were verified once every 12 hours.

This is a Severity Level IV violation.

Response

Portland General Electric (PGE) Company acknowledges that a violation of the Trojan Technical Specification (TTS) did occur. However, the violation acknowledged is not the violation stated pertaining to TTS 4.1.3.1.1, Movable Control Assemblies - Group Height.

During the time period the Plant Computer Rod Position Deviation Monitor Alarm was inoperable, TTS Surveillance Requirement 4.1.3.1.1 was not required as Special Test Exceptions, (i.e. Physics Testing), for the applicable Modes were in effect.

However, during the investigation of this apparent violation, it was discovered a violation of the surveillance requirements of TTS 4.1.3.2, Reactivity Control Systems - Position Indication Channels, did occur as this TTS was not superceded by the Special Test Exceptions.

From July 16 to July 26, 1989, Trojan was in Mode 3 and no control rod position monitoring was required. However, during the time periods July 26 and 27, 1989 and August 1 to August 4, 1989, when the Rod Position Deviation Monitor was out of service, the comparisons of the demand position indication system and the rod position indication system were not made at least once per 4 hours as required.



1. Reason for the Violation:

The reason for the violation is personnel error in that a plant computer variable was not restored following a computer outage. This caused the portions of the Rod Supervision Deviation Monitor that alarms during abnormal rod movement to become inoperable.

2. Corrective Steps that Have Been Taken and the Results Achieved:

The Rod Position Deviation Monitor was determined to be inoperable at 12:00 p.m., August 2, 1989 and control room personnel began logging rod positions in accordance with Periodic Operating Test (POT) 24-1, Shift Operating Routines. During a review of POT 24-1 data on October 18, 1989, PGE discovered that the position of the Shutdown Banks were not recorded from August 1, 1989 to August 4, 1989 as required. Further review identified that POT 24-1 had a weakness in that the form attached for recording Control and Shutdown Bank position did not allocate space for documenting Shutdown Banks during Rod Position Deviation Monitor inoperability. POT 24-1 was deviated October 18, 1989 to provide the required form for recording Shutdown Bank position.

Training Information Bulletin (TIB)-65 was issued on August 2, 1989 to Plant Operations personnel giving information and guidance on the Rod Position Deviation Alarm and the increased surveillance requirements should the computer alarm be unavailable.

The computer problem causing the Rod Position Deviation Alarm to be inoperable was corrected and the Rod Position Deviation Monitor was returned to service August 4, 1989. To lessen the probability of a reoccurrence, a software change to the Plant computer disk was made to restore the variable to its proper value following a restart of the computer.

A deviation was issued on July 28, 1989 to POT 15-1, Full Length Rod Movement Verification, to periodically check that the Rod Supervision Computer Program is active in Modes 1 and 2 (every 31 days) and prior to Plant Startups. Similar procedure changes were made for the computer programs for Axial Flux Difference and Quadrant Power Tilt Ratio monitoring.

3. Corrective Actions to Avoid Further Violations:

No further actions are required.

4. Date When Full Compliance Will be Achieved:

Full compliance was achieved October 18, 1989 when POT 24-1, Shift Operating Routines, was corrected.