Portland General Electric Company

David W. Cockfield Vice President, Nuclear

November 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:

Revision to a Notice of Violation Response

Your letter of August 29, 1989 transmitted several Notices of Violation associated with Nuclear Regulatory Inspection Report 50-344/89-09. In our October 12, 1989 letter, we responded to those Notices of Violation. After further review, we have revised the corrective steps that will be taken to avoid further violation of Violation A. Attachment 1 contains this revised response with a change bar in the right hand margin denoting the changes.

Sincerely,

Attachments

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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RESPONSE TO NOTICES OF VIOLATION

VIOLATION A

Trojan Technical Specification 4.7.6.1 requires that the control room emergency ventilation system be demonstrated OPERABLE at least every 31 days by initiating flow and verifying that the train operates for at least 10 hours with the preheaters on and maintains the control room air temperature less than or equal to 110°F.

Contrary to the above, since May 1988, licensee surveillance testing of the control room emergency cooling system did not demonstrate the system operable in that a recently installed non-safety, supplemental control room cooling system (CB-16) had been in service during the required tests of the control room emergency ventilation system.

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

Response

Portland General Electric (PGE) acknowledges the violation.

1. Reason for the Violation.

   CB-16 was designed as a backup to a safety-related system. With the exception of tornado missile protection, it was designed as safety-related. Although some documents indicate that CB-16 is a safety-related system, the limitations of the system were not fully conveyed to the Plant Operations Staff. Based on this information, the testing procedure was revised to include CB-16 operation during surveillance testing of CB-1. As a result, CB-16 was operated in support of the safety-related control room ventilation system (CB-1).

   The reason for the violation is that CB-16 was not designed as fully safety-related, and there was a failure to communicate and correlate its design with its operational objectives.

2. Corrective Steps That Have Been Taken and the Results Achieved.

   PGE reviewed the design of CB-16 to identify all changes needed to make the system safety-related. Changes have been initiated to upgrade the system to safety-related through preparation of a Probabilistic Risk Assessment (PRA) to address tornado missile protection.

VIOLATION A (continued)

Operability criteria for CB-16 have been added to the testing procedure [Control Room Emergency Ventilation System Performance, Periodic Operating Test (POT)-20-1, Revision 29]. Design calculations show that CB-16 contributes 26°F to the cooling of the control room. Accordingly, we have reduced our acceptance criteria for control room temperature from 110°F to 80°F when CB-16 is operable. Should CB-16 be inoperable, the surveillance test of Technical Specification 4.7.6.1 would be performed with only CB-1 in operation.

3. Corrective Steps That Will Be Taken to Avoid Further Violations.

The PRA addressing tornado missile protection for CB-16 will be submitted for NRC approval by December 15, 1989. The results show that the danger to CB-16 from tornado-generated missiles is negligible. To avoid future violations, we initiated a CB-16 system review to verify that all portions of the system are fully safety-related. As a result of this review, we have determined that a portion of the ductwork used by CB-16 was originally designed to Seismic Category II/I requirements. We are performing an evaluation to demonstrate that the portion of this ductwork necessary for CB-16 operability meets Seismic Category I requirements. We anticipate that this evaluation will be completed by December 15, 1989.

Upon completion of the CB-16 evaluation and your approval of the PRA, CB-16 can be declared fully safety-related.

The Nuclear Safety and Regulation (NSRD) and Nuclear Plant Engineering Departments will review this event as a lessons learned item. The design modification and safety evaluation process will be reviewed by both departments to ensure the design review process requirements are addressed.

4. Date When Full Compliance Will Be Achieved.

Full compliance will be achieved when CB-16 is declared fully safety-related. In the interim, we will continue to test with CB-16 using the revised acceptance criteria contained in POT-20-1. We have discussed this approach with the NRC Region V office.

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