

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

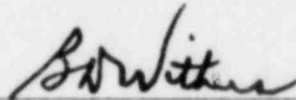
TROJAN NUCLEAR PLANT

Operating License NPF-1
Docket 50-344
License Change Application 64

This License Change Application is submitted in response to a written Commission request to clarify the definition of the term "operable" as it applies to Appendix A Technical Specifications. In addition, specific action requirements are included to insure that use of this term is properly applied to single failure criterion for safety systems in power reactors.

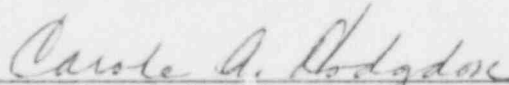
PORTLAND GENERAL ELECTRIC COMPANY

By



Bart D. Withers
Vice President
Nuclear

Subscribed and sworn to before me this 29th day of October 1980.



Notary Public of Oregon

My Commission Expires:

August 9, 1983

4sk/sa2A28

8011030580

LICENSE CHANGE APPLICATION

This LCA is in response to a written Commission request (Eisenhut letter dated April 10, 1980 addressed to all power reactor licensees) to provide the following clarifications to Plant Technical Specifications:

1. An expanded definition of "operable" that includes reference to both normal and emergency power sources for the system, subsystem, train, component or device in question.
2. The additional functional requirements of achieving at least hot shutdown within 6 hr. of hot standby when a Limiting Condition for Operation and/or the associated action statements cannot be met. This requirement is tempered by specifically allowing credit for entering a mode in which the referenced specification is not applicable.
3. Addition of a section (3.0.5) to cover the determination of operability for systems, subsystems, trains, components or devices lacking only their emergency power source or only their normal power source. This section also addresses the action requirements when both power sources are unavailable or when redundant systems are not operable.
4. Expanded Bases discussions for Section 3.0.3 which includes the additional information and requirements listed above as well as a narrative illustration of their applicability.
5. A new section (B3.0.5) to the Bases discussion to specifically outline the conditions that must be met to permit continued operation when either the normal or the emergency power source is not operable. This section includes additional examples to further illustrate the applicability of these requirements.

REASON FOR CHANGE

This LCA is intended to clarify the use of the term "operable" as it applies to the single failure criterion for safety systems in power reactors. All standard Technical Specifications contain limiting conditions for operation that require redundant components of safety-related systems to be operable. The changes specified herein expand the definition of this term and add sections to the Technical Specifications covering specific situations where either exceptions or more stringent functional requirements may apply.

SAFETY EVALUATION

1. Effect on Technical Specifications and Bases

Appendix A to Trojan Operating License NPF-1 will be modified as described above. The Bases for the Technical Specifications

have been revised accordingly. Revised pages with amendment lines illustrating these changes are provided.

2. Effect on the FSAR

The proposed change only affects administrative actions and does not alter the technical descriptions of Plant facilities provided by the FSAR. The actions covered by this change do not introduce any new accidents and will not affect the results or consequences of any presently analyzed transients. Likewise, no reduction in the margin of safety is associated with this change, so no unreviewed safety question is involved.

3. Environmental Effect

The administrative controls proposed by this LCA would simply add assurance that the present environmental limits would be adhered to for all operational and transient conditions. Since the environmental analyses presented in the FSAR, the Environmental Report and the Final Environmental Statement will not be affected by this change, it does not qualify as an unreviewed environmental question.

SCHEDULE CONSIDERATIONS

Since this License Change Application is submitted in response to a written Commission request, and since no significant hazards or other safety considerations are involved, Licensee expects that review and approval would be completed within 60 days.

BASIS FOR DETERMINATION OF LICENSE CLASS AND REQUEST

This LCA is judged to result in an amendment that would be "pro forma, administrative, or have no safety or environmental significance." However, in accordance with Footnote 2 of 10 CFR 170.22, this LCA is in response to a Commission request to clarify the Technical Specifications so no fee is necessary.