

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 69

This License Change Application is submitted in support of Licensee's request to modify Appendix A of Facility Operating License NPF-1 by addition of new Technical Specifications regarding implementation of TMI Lessons Learned Category "A" Action Items.

PORTLAND GENERAL ELECTRIC COMPANY

By

B. Withers

Bart D. Withers
Vice President
Nuclear

Subscribed and sworn to before me this 31st day of October 1980.

Carole A. Hodgdon

Notary Public of Oregon

My Commission Expires:

August 9, 1983

LICENSE CHANGE APPLICATION 69

- l. Modify the below-listed pages of Technical Specifications (Appendix A to FOL NPF-1) as shown in the Attachment:
 - a. Change INDEX Sections 3/4.3.3 (Page IV) and 3/4.4.3 (Page V) and Basis Section 3/4.4.2 with the Attachment pages.
 - b. Add Section 3/4.3.3.9, "ACCIDENT MONITORING INSTRUMENTATION" (Page 3/4 3-51), Table 3.3-11 "ACCIDENT MONITORING INSTRUMENTATION" (Page 3-52), and Table 4.3-7 "ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS" (Page 3-53).
 - c. Change Basis section on Page B 3/4.3-3 to add Section 3/4.3.3.9, "ACCIDENT MONITORING INSTRUMENTATION" (Page B 3/4 3-3).
 - d. Change the heading of "Section 3/4.4.3 SAFETY VALVES - OPERATING" (Page 3/4 4-4) to "Section 3/4.4.3 SAFETY AND RELIEF VALVES - OPERATING" and add Subsection "RELIEF VALVES" (Page 3/4 4-4a).
 - e. Change Basis section on Page B 3/4 4-1 to add Section 3/4.4.3, "SAFETY AND RELIEF VALVES".
 - f. Change Section 3/4.4.4, "PRESSURIZER" (Page 3/4 4-5), with the Attachment page.
 - g. Change Basis Section 3/4.4.4, "PRESSURIZER" (Page B 3/4 4-2), with the Attachment page.
 - i. Change Figure 6.2-2, "FACILITY ORGANIZATION" (Page 6-3) and Table 6.2-1 "MINIMUM SHIFT CREW COMPOSITION" (Page 6-4), with the Attachment pages.
 - j. Change Section 6.3, "FACILITY STAFF QUALIFICATIONS" (Page 6-5), with the Attachment page.
 - k. Change Section 6.9.2, "SPECIAL REPORTS" (page 6-18), with the Attachment page.
 - l. Change Section 3/4.8.1.1, "SURVEILLANCE REQUIREMENTS" for "AC SOURCES", with the Attachment page.

REASONS FOR CHANGE

On July 2, 1980, the NRC issued a set of model Technical Specifications regarding TMI-2 Lessons Learned Category "A" action items. The Category "A" action items were the outcome of investigation efforts by the NRC Lessons Learned Task Force on the TMI-2 accident and were required by the NRC for their completion by January 1, 1980. PGE later committed to complete them in accordance with the NRC schedule, and all the Category "A" action items have been completed on schedule.

The attached Technical Specification changes consist of either modification to the existing TNP Technical Specifications or additional, new specifications to reflect design changes made as a result of NUREG-0578 recommendations. All of the Category "A" action items implemented at the Trojan plant have been reviewed and approved by the NRC. The NRC had already set a tentative deadline of December 15, 1980 for the implementation of the model Technical Specifications (NRC letter to PGE on September 5, 1980). On September 12, 1980, PGE submitted a response to the NRC letter of July 2, 1980 and agreed to provide a License Change Application for the model Technical Specifications by November 3, 1980.

Aside from the Lessons Learned actions, the NRC Resident Inspector had identified that the existing Trojan Technical Specifications do not contain explicit requirements for testing the shutdown load sequencer. Since Trojan presently tests both the DBA sequencer and the shutdown sequencer under simulated conditions, agreement was made with the NRC to modify Technical Specification 4.8.1 to include a Surveillance Requirement of the shutdown sequencer.

SAFETY EVALUATION

This LCA has been reviewed, evaluated and determined to not constitute an unreviewed safety question. No new accidents are created and the probability and consequences of accidents previously considered remain unchanged or are reduced. No environmental effects or impacts result from this LCA.

Section 3.3.3.6 "Accident Monitoring Instrumentation" provides specifications for RCS subcooling margin monitors (SMMs) and valve position indicators for the pressurizer PORV, PORV block valves and safety valves. The SMMs have been installed to provide the operator with an on-line indication of the saturation condition of the core and reactor coolant loops. Signal inputs to the SMMs are obtained from hot-leg RTDs, incore thermocouples and wide-range pressure sensors on RHR suction leg of the RCS Loop 4. Since this is a new instrumentation added to aid the operator for recognition of inadequate core cooling condition, it will neither create new accidents nor increase probability and consequences of accidents.

The valve position indicators in Section 3.3.3.9 consist of stem-mounted limit switch on pressurizer PORV, cam-operated limit switch on PORV block valves and acoustic monitoring device for safety valves. These indicators are installed to provide a direct and positive indication of the valve position in the control room so that appropriate operator actions can be taken. This modification will improve the Plant system reliability. As such, no new accidents are created by the proposed change and the probability of accidents previously considered remain unchanged or are reduced.

Section 3/4.4.3 "Safety and Relief Valves - Operating" requires operability of PORVs and block valves during MODES 1, 2 and 3. This is in response to the NRC position in NUREG-0578 which requires that motive and control components of the PORVs and block valves shall be capable of being supplied from the offsite power source or the emergency power source when the offsite power source is not available. The existing electrical power and control circuits for the PORVs and block valves are supplied from Class 1E station batteries or emergency diesel generators, respectively. This power supply design ensures the ability to seal the possible leakage path through the PORVs and block valves. Since this Technical Specification change provides added assurance for post-accident functioning of these components, the potential for and the consequence of accidents already considered remain unchanged or reduced.

The proposed Technical Specification change in Section 3/4.4.4 "Pressurizer" also reflects the NRC requirements of emergency power supplies to the pressurizer heaters, necessary amount of pressurizer heaters and associated controls desirable to establish and maintain natural circulation conditions. Since this Technical Specification change provides additional assurance to maintain natural circulation condition at hot standby condition, the potential for and consequences of accidents previously considered remain unchanged or reduced.

The Technical Specifications in Sections 6.2 and 6.3 regarding an addition on the shift of the Shift Technical Advisor reflect the current organization at the Trojan Nuclear Plant after January 1, 1980 and does not constitute an unreviewed safety question.

The existing Technical Specifications do not explicitly require the surveillance testing of the shutdown load sequencer, although it is routinely tested at Trojan. The function of the shutdown sequencer is to sequence load of the emergency buses essential for the safe shutdown of the Plant following a complete loss of power (station blackout). Under a loss of power situation, the shutdown sequencer operates without the presence of a safety injection signal. Since the proposed Technical Specification change, consistent with the current surveillance program at Trojan, provides added assurance for operation of the shutdown load sequencer, the potential for and the consequences of accidents already considered remain unchanged or reduced.

AMENDMENT CLASS

This LCA has been determined to result in a Class III Amendment in accordance with the criteria of 10 CFR 170.22. This LCA involves a single issue of complying with the NRC model Technical Specifications on the TMI Lessons Learned actions and does not involve a significant safety hazard. As such, it is subject to a \$4,000 fee, and a check for this amount is attached with this LCA.