



Portland General Electric Company

David W. Cockfield Vice President, Nuclear

December 18, 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 November 16, 1989 transmitted Notices of Violation associated with Nuclear Regulatory Commission (NRC) Inspection Report 50-344/89-24. Attachment 1 is our response to the violations contained in that report.

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

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REPLY TO A NOTICE OF VIOLATION

Violation A

10 CFR Part 50, Appendix B, Criterion XII, states that "Measures shall be established to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specified periods to maintain accuracy within necessary limits."

Contrary to the above, dial indicators used to determine dimensions on safety-related equipment were not in the licensee's program for calibration or adjustment at specified periods. Specifically, such dial indicators were used under Maintenance Request (MR) 89-9141 to inspect the thrust bearing clearances for the Centrifugal Charging Pump (CCP) shaft.

This is a Severity Level IV violation.

Response

Portland General Electric Company (PGE) acknowledges the violation.

1. Reason for the Violation:

The reason for the violation is a procedural deficiency. Investigation of the event discovered conflicting instructions in procedures regarding the calibration requirements for dial indicators used as measurement and test equipment. The procedures did not define the requirements for calibrating dial indicators in all cases.

2. Corrective Steps that have been Taken and the Results Achieved:

- a. Maintenance Department Procedure (MDP)-1-12, "Dial Indicators", was revised November 9, 1989 to provide specific instructions for calibrating and inspecting dial indicators and dial indicator testers. The procedure revision includes instructions to calibrate all dial indicators to be used on quality-related jobs prior to use.
- b. Mechanical planners were instructed to include the requirement for use of calibrated dial indicators in MR work instructions. Each MR requiring the use of a dial indicator will include a statement in the MR recording the calibration date and serial number of the dial indicator used.

- c. All mechanical maintenance personnel were informed of the requirements of MDP-1-12, and instructed to record the calibration date and serial number of the dial indicator used in the appropriate place in the Maintenance Request.
3. The Corrective Steps that will be Taken to Avoid Further Violations:

No additional corrective actions are required.
4. Date when Full Compliance will be Achieved:

Full compliance was achieved November 9, 1989 following the implementation of Revision 1 to MDP-1-12.

Violation B

10 CFR Part 50, Appendix B, Criterion V, states that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Maintenance Procedure (MP) 2-0, Revision 12, "Installed Plant Instrument Maintenance and Calibration", describes the general guidelines for maintenance and calibration of installed plant instrumentation.

MP 2-0 states that "If the As Found readings for quality-related instruments are outside the stated tolerance (or if the instrument is completely failed), the I&C technician shall complete the testing portion of the procedure, where applicable, and bring it to the attention of the I&C Supervisor or his designee. They shall initiate a Form I&C-10, Installed Instrument Out-of-Calibration Investigation for Quality-Related Instruments."

Contrary to the above, on August 31, 1989, the PICT 11-1 data sheet recorded the as-found value as 791.5 volts for the detector voltage, which was outside the 800 \pm 5 volts criterion, but the licensee did not initiate an out-of-calibration investigation.

This is a Severity Level IV violation.

Response

PGE acknowledges the violation.

1. Reason for the Violation:

- a. The reason for the violation is personnel error resulting in a failure to acknowledge and take corrective action for an out-of-tolerance condition identified during Periodic Instrument and Control Test (PICT) 11-1. The Instrument and Control (I&C) technicians did not consider the out-of-tolerance condition on the power supply voltage to Power Range Nuclear Instrument N43 to be the same as finding a bistable out-of-tolerance and did not initiate an out-of-calibration investigation (I&C Form 10).
- b. The I&C Unit Supervisor also failed to notice the out-of-tolerance condition due to a lack of attention to detail during the review of the PICT 11-1 data sheet.

2. Corrective Steps that have been Taken and the Results Achieved:

- a. The power supply was adjusted to within the accepted voltage value of 800 \pm 5 volts.
- b. The power supply out-of-tolerance condition evaluation was completed October 31, 1989 by Plant Systems Engineering and was found to have no adverse effect on the actual operation of the nuclear instrument channel. The I&C Form 10 for N43 was completed December 15, 1989.
- c. A formal review of the event was held in the make up session for Maintenance Annual Training during the week of November 30, 1989.

3. Corrective Steps that will be Taken to Avoid Further Violations:

- a. Nuclear Plant Engineering and I&C Maintenance will provide unique Trojan tag numbers and I&C Form 10 data sheets for nuclear instrument drawer power supplies. This will assist in providing the ability to evaluate out-of-tolerance conditions in accordance with MP 2-0. Scheduled completion for this action is March 31, 1990.
- b. A formal review of this event will again be held during the first quarter Maintenance Annual Training scheduled to be completed by March 31, 1989.

4. Date when Full Compliance will be Achieved:

Full compliance was achieved on December 15, 1989 when the missed out-of-calibration investigation form (I&C-10) was completed.