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 79

This License Change Application requests modification of Technical Specifications 3.3.3.7 and 4.7.8.3a contained in Appendix A to Operating License NPF-1 to upgrade fire detection requirements for the Trojan Nuclear Plant and to reduce man-rem exposure during fire equipment inspections inside Containment.

PORTLAND GENERAL ELECTRIC COMPANY

By B. D. Withers

B. D. Withers
Vice President
Nuclear

Subscribed and sworn to before me this 8th day of October 1981.

Carole A. Rodgdon
Notary Public of Oregon

My Commission Expires: August 9, 1983

LICENSE CHANGE APPLICATION 79

The proposed replacement pages to Appendix A of Facility Operating License NPF-1 are provided as Attachment 1. A description of these changes follows:

1. Pages 3-49 through 3-49b. Technical Specification Table 3.3-10 has been modified to include fire detection zones and require that a minimum number of detectors in these zones be operable. Additional instrument locations and fire detection zones were also added to Table 3.3-10 to ensure fire protection for systems and components required for safe shutdown.

2. Page 3/4 7-29. The following additional paragraph was added to Technical Specification 4.7.8.3a:

   "Fire hose stations which are not accessible during Plant operation should be inspected during each cold shutdown exceeding 24 hours unless performed in the previous 31 days."

3. Page 3/4 7-30. Technical Specification Table 3.7-4 has been revised to include a footnote for the Containment hose stations (items 11, 12, and 13) stating that these hose stations will be "inspected during cold shutdown".

REASON FOR CHANGE

Technical Specification 3.3.3.7 requires that "as a minimum, the fire protection instrumentation for each fire detection zone shown in Table 3.3-10 shall be OPERABLE". However, the current Table 3.3-10 is based on instrument locations instead of fire detection zones. With the current requirements, the potential exists that all the detectors in a particular zone could be inoperable without violating Technical Specification 3.3.3.7. Therefore, Table 3.3-10 should be changed to include fire detection zones and require that a minimum number of detectors in these zones be OPERABLE.

Technical Specification 4.7.8.3a requires visual inspection of the fire hose stations inside Containment at least once every 31 days. In order to reduce man-rem exposures to as low as reasonably achievable (ALARA), the fire hose stations located in Containment should be inspected only during cold shutdown.

SAFETY/ENVIRONMENTAL EVALUATION

Summary of Change

Technical Specification Table 3.3-10 will be modified to include fire detection zones and require that a minimum number of detectors in these zones be OPERABLE. Additional instrument locations and fire detection zones were added to Table 3.3-10 to ensure fire protection for systems and components required for safe shutdown.

Technical Specification 4.7.8.3a requires a visual inspection of the three hose stations located inside Containment every 31 days. This requirement mandates entry inside Containment every 31 days regardless of whether or not the Plant is in operation. This requirement is unnecessarily restrictive and may be relaxed and made more practical without causing undue risk to the public health and safety. The proposed change will require surveillance of the hose stations only during cold shutdowns exceeding 24 hours in length. This change will be consistent with the existing surveillance requirement for fire detectors inside Containment, and it will provide the added benefit of keeping radiation exposures to Plant personnel as low as reasonably achievable.

Effect on Technical Specifications and Bases for Technical Specifications

Technical Specification Table 3.3-10 will be modified by the proposed change. The proposed change does not reduce the number of detectors required to be OPERABLE in the instrument locations. However, at least one detector will be required to be OPERABLE in each fire detection zone identified in Table 3.3-10. Since the proposed change is more restrictive than the current operability requirements and since the required action to be taken in the event of detector inoperability was not changed, no changes to the Technical Specification Bases are required.

Technical Specification 4.7.8.3 will be changed to allow testing of the Containment hose stations during cold shutdowns exceeding 24 hours in length, unless performed in the previous 31 days. This change will have a negligible effect on the operability of the fire supression system inside Containment, and it will not affect the capability of the alternate backup fire-fighting equipment. Therefore, no changes to the Technical Specification Bases are required.

Effect on FSAR

The proposed change will not affect the Final Safety Analysis Report or PGE's Topical Report 1012, "Trojan Nuclear Plant Fire Protection Review". The proposed change will not introduce any new accidents or affect the results of any previously analyzed accident or fire protection analysis. No unreviewed safety issue is involved, and no changes to the FSAR are required.

Environmental Effects

The proposed changes will not affect effluent types or alter any discharge limits. No unreviewed environmental matter exists, and there will be no impact to the environment from this change.

Basis for Determination of Amendment Class

This License Change Application has been determined to result in a Class 2 amendment in accordance with the criteria of 10 CFR 170.22. The change is "pro forma" in nature and does not have any safety or environmental significance.