



**Portland General Electric Company**

James E. Cross  
Vice President and Chief Nuclear Officer

March 3, 1993

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington DC 20555

Dear Sir:

Cancellation of Commitments

Due to the permanent shutdown of the Trojan Nuclear Plant, Portland General Electric Company (PGE) is canceling or changing several commitments that were made based on the assumption of continued operation. commitments are described on the attachment.

PGE is continuing to review commitments made to the Nuclear Regulatory Commission (NRC). Additional commitments identified that should be canceled or modified will be the subject of future correspondence.

Sincerely,

W. R. Robinson  
for J. E. Cross

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. Kenneth Johnston  
NRC Senior Resident Inspector  
Trojan Nuclear Plant

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NUCLEAR REGULATORY COMMISSION (NRC)  
COMMITMENTS BEING CANCELED OR CHANGED DUE  
TO THE PERMANENT SHUTDOWN OF TROJAN

A. Commitment

NRC Inspection Report 50-344/92-07 identified a concern related to surveillance of safety-related skid mounted check valves. Portland General Electric Company (PGE) developed a plan to identify these check valves and other skid mounted components to ensure that surveillance procedures were adequate to assure operability. This plan was detailed in an internal memorandum provided to the resident inspector.

Current Action

The portion of the plan related to the skid mounted check valves was completed and did not identify any required surveillance procedure changes. The remaining portions of the plan detailed in the internal memorandum will not be performed.

B. Commitment

In response to Unresolved Item 91-01-08, PGE committed to protect the power-operated relief valve (PORV) leakage path from loss of inventory due to multiple hot shorts. This commitment was documented in NRC Inspection Report 50-344/92-19.

Current Action

Trojan's Reactor Coolant System (RCS) will remain depressurized; therefore, loss of inventory through the PORVs is not a concern. The modifications required to protect the PORV leakage path from multiple hot shorts will not be made.

C. Commitment

During the management meeting held with the NRC to discuss the 1991/1992 Systematic Assessment of Licensee Performance (SALP) report, PGE committed to have Shift Technical Advisors (STAs) on shift with the operating crews by the end of the 1993 Refueling Outage.

Current Action

Trojan will not be resuming power operation; therefore, this action will not be taken.

D. Commitment

In Licensee Event Report (LER) 92-12, "Design of Feedwater Isolation System Such that Adjustment of One Actuation Train Affects the Other Train and had the Potential to Cause Isolation Time to Exceed Limits", PGE committed to perform a modification to provide a balanced vent path for the solenoid actuators.

Current Action

Since Trojan will not be entering a mode that requires the ability to isolate the feedwater line, this modification will not be made.

E. Commitment

In LER 92-04, "Failure to Measure Control Room Differential Pressure Relative to Auxiliary Building Due to Improper Technical Specification Interpretation", PGE committed to install instrumentation to measure differential pressure between the Control Room and the Auxiliary Building by the end of the 1993 Refueling Outage.

Current Action

This measurement is being made using a portable pressure measurement device. This device is adequate to perform the required surveillance. Permanent installation of differential pressure instrumentation will not be made.

F. Commitment

In a letter dated June 2, 1989, PGE committed to replace the heat exchangers for the centrifugal charging pump lube oil and gear reducer oil coolers and the safety injection pump lube oil cooler.

Current Action

The centrifugal charging pumps and safety injection pumps are not required to be operable while defueled; therefore, these replacements will not be made.

G. Commitment

In response to NRC Unresolved Item 88-36-03, PGE committed to modify the steam generator level and RCS wide range temperature instrument loops to comply with Regulatory Guide 1.97 design criteria.

Current Action

The primary safety function of both the RCS hot-leg and cold-leg temperature and steam generator wide-range level instrumentation is to indicate the accomplishment of reactor core cooling. This function is not required while defueled; therefore, this modification will not be made.

H. Commitment

In the response to NRC Bulletin 88-04, PGE committed to add check valves downstream of the residual heat removal (RHR) heat exchangers to prevent a possible strong pump-weak pump interaction.

Current Action

A check valve was installed in the "A" RHR pump discharge flow path. The RHR pumps are not required to be operable while defueled; therefore, a check valve will not be installed in the "B" RHR pump discharge flow path.

I. Commitment

Due to a disparity between installed and vendor recommended flow rates for the auxiliary feedwater (AFW) pumps, PGE committed to disassemble and inspect the pumps every five years. This commitment was documented in NRC Inspection Report 50-344/91-32.

Current Action

Since Trojan will not be entering a mode that requires the AFW pumps to be operable, these inspections will no longer be performed.

J. Commitment

In LER 92-21, "Incorrect Installation of The Main Steam Isolation Valves' Air Supply Vent Valves Caused Vent Valves to Be Inoperable For Isolating Main Steam", PGE committed to correct the orientation of the main steam isolation valves' vent valves and revise emergency fire procedures to reflect the correct vent valve orientation.

Current Action

Since Trojan will not be entering a mode that requires the main steam isolation valves to be operable, the modification and associated procedures changes will not be made.

K. Commitment

In response to NRC inspector concerns with an operability determination performed on the pressurizer PORVs, PGE committed to add an STA review to the operability determination process. This commitment was documented in NRC Inspection Report 50-344/92-10.

Current Action

STAs were to have been stationed on shift in Modes 1 through 4. Since Trojan will not be operating in these modes again, the STA program has been discontinued. The operability determination process will not be changed.

L. Commitment

In a letter dated October 24, 1991, PGE committed to an Emergency Response Data System (ERDS) implementation plan.

Current Action

56 FR 40178 exempts nuclear power facilities that are shut down permanently from the requirement to implement ERDS; therefore, PGE has discontinued work on the ERDS implementation at Trojan.

M. Commitment

In LER 92-03, "Failure to Place an Inoperable Containment Pressure Channel in Bypass", PGE committed to install a permanent bypass feature for the containment pressure channels.

Current Action

Accident monitoring instruments, including the containment pressure instruments, are only required to be operable in Modes 1, 2, and 3. Since Trojan will not be entering these modes again, this action will not be taken.

N. Commitment

In the exit meeting for NRC Inspection 50-344/92-15, PGE committed to purchase a complete security entry line equipment set and establish a hands-on training area for this equipment.

Current Action

The planned staff reductions at Trojan will permit use of the existing security equipment for training between shift changes; therefore, a dedicated training line will not be established.

O. Commitment

In LER 92-02, "Inadequate Disc Nut Locking Device Design Results in Residual Heat Removal Pump Discharge Check Valve Failure", Revision 1, PGE committed to examine and modify Valve 8958, RHR suction from the refueling water storage tank (RWST).

Current Action

The RWST is only required to be operable in Modes 1 through 4. Since Trojan will not be entering these modes again, this action will not be taken.

P. Commitment

In a meeting held with Trojan's Senior Resident Inspector on May 14, 1992, PGE committed to revise procedures testing the emergency diesel generators (EDGs) fast start and loading capabilities. This commitment was documented in NRC Inspection Report 50-344/92-10.

Current Action

One procedure that has not yet been revised implements Technical Specification Surveillance Requirement 4.8.1.1.2.c, which is not applicable while defueled. This procedure will not be revised.

Q. Commitment

In a letter dated February 25, 1955, PGE committed to prepare an instrument data sheet for each electrical instrument in use at Trojan.

Current Action

This action was intended to reduce the possibility of data discrepancies by consolidating engineering design information into a single document. Since Trojan has been permanently defueled, these data discrepancies would have little or no safety significance. Work on this project will be discontinued.

R. Commitment

In response to concerns raised during NRC Inspection 50-344/91-40, PGE committed to implement Annunciator Response Procedures for control room safety-related annunciators, safety-related annunciators at local panels, and alarms that are received on the computer and cathode ray tube (CRT) only in the Control Room.

Current Action

Annunciator Response Procedures were implemented for Control Room safety-related annunciators. The remaining portions of this project will be completed only for systems required to support defueled operation.

S. Commitment

In the response to a Notice of Violation (NOV) dated May 22, 1989, PGE committed to prepare Design Basis Documents (DBDs) for 12 safety-related systems. This DBD program was later expanded to include additional systems. The DBD program was described in the Nuclear Division Improvement Plan, discussed with the NRC in a management meeting held on January 17, 1991, and described in LER 89-16, "Inadequate Management Oversight, Procedure Deficiencies, and Personnel Errors Result in Power Operation with an Inoperable Containment Recirculation Sump".

Current Action

DBDs have been issued for the 12 safety-related systems listed in the May 22, 1989 NOV response letter.

The DBD program was intended to support design work for an operating plant. Due to the permanent closure of Trojan, this program is no longer cost effective. Should any further work be done on the DBD program, it will be significantly reduced in scope.

T. Commitment

In Special Report 91-1 PGE committed to determine if the design of the containment sump level instruments should be modified, and if so to install the modification during the next outage of sufficient length.

Current Action

The Containment sump level instruments are only required to be operable in Modes 1 through 4. Since Trojan will remain defueled, the Containment sump level instruments will not be modified.

U. Commitment

In a letter dated October 4, 1991, PGE committed to replace 20 neutron shielding water bags during the 1993 Refueling Outage.

Current Action

The neutron shielding water bags are used for personnel shielding during operation. Since Trojan will not be operating at power, the water bags will not be replaced.

V. Commitment

In LER 91-29, "Potential for Control Room Doses to Exceed Design Limits Following a Fuel Handling Accident Due to Incorrect Analysis", PGE committed to install an upgraded radiation monitoring system for the Control Room to assure that the Control Room is isolated should a fuel handling accident occur.

Current Action

Due to fission product decay, the radiological consequences of a fuel handling accident have been significantly reduced. By May 9, 1993, Control Room isolation will no longer be required to maintain operator doses within the limits of Title 10 of the Code of Federal Regulations, Part 50 (10 CFR 50), Appendix A, General Design Criterion 19. The existing Control Room isolation system will not be upgraded.

W. Commitment

In LER 91-06, "Failure of Inverter Which Supplies 120 VAC Preferred Instrument Panel Results in Plant Shutdown Per Technical Specifications", PGE committed to acquire and calibrate a complete set of circuit boards for each of inverters Y15, Y17, Y26, and Y28.

Current Action

This action was intended to avoid a forced shutdown due to an inverter failure. Since Trojan will not operate again, this action will not be completed.

X. Commitment

In LER 92-31, "Non-Functional Fire Barrier Penetration Seal Due to Inadequate Installation During Original Plant Construction", PGE committed to conduct an investigation to determine the extent of grouted fire protection deficiencies and to develop appropriate corrective actions.

Current Action

Trojan's fire barrier surveillance program was improved to provide more detailed inspections of both fire barriers and barrier penetrations. Since Trojan will remain permanently defueled, the likelihood and consequences of a fire are significantly reduced. This investigation is no longer cost effective and will not be completed. PGE will continue to investigate and repair grouted fire protection deficiencies, as appropriate, as they are discovered.

Y. Commitment

In LER 90-11, "Control Room Emergency Ventilation System Unfiltered In-leakage Exceeds FSAR Value Apparently Due to Degraded Sealant on Duct as a Result of Incomplete Work Instructions", PGE committed to modify the Control Room Emergency Ventilation System (CB-1) to eliminate operation of the filter housing and associated ductwork at a negative pressure.

Current Action

Due to fission product decay, the radiological consequences of a fuel handling accident have been significantly reduced. By May 9, 1993, CB-1 will no longer be necessary to maintain operator doses within the limits of 10 CFR 50, Appendix A, General Design Criterion 19. CB-1 will not be modified.

Z. Commitment

In a letter dated June 1, 1992, PGE committed to seal the CB-1 ducting and filter housing with an improved sealing medium and to install redundant outside air intake dampers. To support this modification PGE planned to request a temporary waiver of compliance to permit the simultaneous modification of both CB-1 trains.

Current Action

Due to fission product decay, the radiological consequences of a fuel handling accident have been significantly reduced. By May 9, 1993, CB-1 will no longer be necessary to maintain operator doses within the limits of 10 CFR 50, Appendix A, General Design Criterion 19. These modifications to CB-1 will not be made and the request for a temporary waiver of compliance will not be submitted.

AA. Commitment

In LER No. 92-26, "Fire Barrier Deficiencies Identified As Result of Ongoing Fire Barrier Surveillance Program", Revision 4, PGE committed to review as-built documentation for fire barrier Penetrations 101 through 1214, to identify other penetrations that may have been identified as needing to be upgraded to 3-hour fire barrier requirements, but were not upgraded.

Current Action

Since Trojan has been permanently defueled the scope of required fire barriers is being reevaluated. As-built documentation for appropriate fire barriers will be reviewed after this evaluation is complete. These actions are expected to be complete by October 28, 1993.

BB. Commitment

In LER No. 92-30, "Inattention to Detail Caused Missed Surveillance on Remaining A.C. Power Sources after Removing Emergency Diesel Generator for Maintenance", PGE committed to revise Periodic Operating Test (POT) 21-2 to include instructions for providing additional reminders to perform the next 8-hour surveillance whenever an EDG or an offsite power source is out of service.

Current Action

The 8-hour surveillance is required only in Modes 1 through 4 after an A.C. power source has been removed from service. Since Trojan will not be entering these modes, this procedure change will not be made.