



Portland General Electric Company

Bart D. Withers Vice President

August 18, 1982

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir:

Inservice Testing Relief Request

Pursuant to a conversation with C. M. Trammell of the NRC staff, the following information is being provided regarding the Inservice Testing Relief Requests which were transmitted to the NRC on July 23, 1982 for the Trojan Nuclear Plant.

1) Item 3.2.3, Auxiliary Feedwater Pump Relief Request
(Pumps 102A and 102B)

These pumps are tested while on recirculation flow to the Condensate Storage Tank. Although this pathway does not have flow indication, measurement of pump suction and discharge pressure will indicate the condition of the pump since they are on a fixed resistance pathway. Use of a fixed resistance pathway has the added benefits of enhancing the repeatability of testing results and also eliminates perturbations that would occur if the pathway that includes the auxiliary feedwater lines to the steam generators (which does have flow indicators) were used. The attached relief request has been revised accordingly to reflect the above clarification.

2) Item 4.2.8.2, Event V Valves Relief Request

These valves are being tested in accordance with the NRC order dated April 20, 1981 for Trojan Technical Specification 3/4.4.6.2. A review of the requirements of this order

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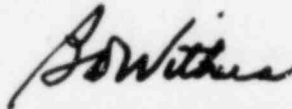
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has shown them to be compatible with the testing requirements of the ASME Section XI requirements. Therefore, the relief request for these valves is being withdrawn. The revised pages showing this change are attached.

Sincerely,



Bart D. Withers
Vice President
Nuclear

Attachments

c: Mr. Lynn Frank, Director
State of Oregon
Department of Energy

Test Requirement: Measure pump inlet pressure, differential pressure, flow rate, vibration amplitude, bearing temperature, and lubricant.

Basis for Relief: "Instrumentation Not Originally Provided."
ASME VIII pumps at Trojan were not required to be designed for testing for operational readiness as per 10 CFR 50.55a(g).

These pumps are located inside the diesel oil storage tanks. The pumps are inaccessible and instrumentation was not provided for measurement of inlet pressure, differential pressure, flow, vibration amplitude, or bearing temperature.

Alternate Testing: Pump discharge pressure will be measured and the inlet pressure will be calculated from tank level and the suction head on the pump. The differential pressure will be taken as the difference between pump discharge pressure and calculated inlet pressure.

The pumps are enclosed within the diesel oil storage tanks and accessibility is not available for measuring pump vibration amplitude.

The pump bearing temperature and flow rate will not be measured, and the lubricant will not be observed.

3.2.3 Feedwater System: Pumps P102A and P102B

Code Class: ASME VIII, Division 1

Function: The auxiliary feedwater pumps provide a backup to the normal feedwater pumps to ensure the safety of the Plant and protection of steam generators when the normal feedwater pumps are unavailable.

Test Requirement: Measure the flow rate every 3 months.

Basis for Relief: "Instrumentation Not Originally Provided."
ASME, Section VIII, pumps at Trojan were not required to be designed for testing for operational readiness, as per 10 CFR 50.55a(g). These pumps are tested using a fixed resistance flow path (recirculation flow to the condensate storage tank). Instrumentation was not provided for measurement of flow rate in the flow path.

Alternate Testing: The inlet pressure, differential pressure, rotative speed, bearing temperature, and vibration amplitude will be measured for each of these pumps. Measurement of these pump parameters will provide evidence to assess the operational readiness of these pumps. Flow rate will not be measured.

3.2.4 Chemical and Volume Control System: Pumps P205A and P205B

Code Class: 2

Function: These pumps normally are not operating when the positive displacement charging pump is available, but in the event that the charging flow requirements exceed the capacity of the positive displacement charging pump, one of these pumps is put online and the positive displacement charging pump is shut down. During an LOCA, both of these pumps operate as part of the Safety Injection System.

Test Requirement: Measure the flow rate every 3 months.

provide adequate seat tightness in maintaining Containment integrity will require the same corrective action for repair and replacement of the valve. Therefore, based on provisions in Section XI which allow the owner to specify the valve seat leakage criteria, testing under the Section XI requirements would only require duplication of documentation without any added benefit as far as testing or analyzing of test data for assurance of leakage integrity.

Alternate Testing: These valves are tested for seat leakage rate during local leakage rate testing in accordance with Appendix J to 10 CFR 50 and will not be tested under this program.

4.2.8.2 Valves: Valves Designated for Review Under the Criteria for Appendix J to 10 CFR 50

These valves were identified by NRC staff during the preliminary meeting for resolving IST comments and are being reviewed by the NRC for applicability to Appendix J, "Containment Boundary Criteria". The valves have been included within this program for administrative documentation only. Testing of these valves will be reevaluated upon completion of the NRC review.