



Portland General Electric Company

James E. Cross Vice President, Nuclear

September 27, 1990

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

During the period of June 25 through June 29, 1990, Trojan's motor-operated valve program was inspected under Inspection Report No. 90-20. Your letter of August 30, 1990 forwarded one Notice of Violation associated with this inspection. Attachment 1 provides our response to the Notice of Violation.

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 NOTICE OF VIOLATION

Violation

Title 10, of the Code of Federal Regulations, Part 50 (10 CFR 50), Appendix B, Criterion V, states, "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 . . ."

Nuclear Division Procedure (NDP) 100-13, "Operating Experience Review Program", Section 5.1.B.1, states, ". . . It is the responsibility of the recipient to ensure that the Operating Experience Review Program (OERP) Coordinator receives a copy of all incoming operating experience information. Typical sources of this information include: . . .
c. Vendor Information . . . 4. . . .Limatorque, . . ."

Contrary to the above, at the time of the inspection, Limatorque Maintenance Update Numbers 88-2, 89-1, and 90-1 were received by individual Portland General Electric Company staff who did not forward the documents to the Operating Experience Review Program Coordinator for control and future retrieval.

Response

1. Reason For The Violation:

The reason for the specific violation was personnel error in that the engineer who received the Limatorque Maintenance Updates did not follow Portland General Electric Company's (PGE) procedural requirement to place "vendor operating experience information" into the OERP.

A contributing cause for this violation is a procedural weakness in that the requirements concerning vendor information are not specific as to what documents should be forwarded for consideration within the OERP.

2. Corrective Steps Taken And Results Achieved:

The subject Limatorque Maintenance Updates have been processed through the OERP for documentation and review. Limatorque has been instructed to address future correspondence containing technical information to the Manager, Nuclear Plant Engineering (NPE).

A Corrective Action Request (CAR) was issued on the failure to formally review the Limitorque maintenance updates. The CAR program documents, evaluates, and corrects discrepant Plant conditions and programs.

An Administrative Directive has been issued for NPE personnel to forward unsolicited correspondence that affects or could affect Plant equipment or documents to NPE Administrative Services for logging, tracking, and forwarding to the OERP coordinator. This directive also requires personnel requesting vendor information to advise the vendor to address correspondence to the Manager, NPE.

3. Corrective Steps That Will Be Taken To Avoid Further Violation:

Vendors on the Approved Suppliers List (ASL) supplying safety-related equipment will be contacted and instructed to address unsolicited technical information to the Manager, NPE and to copy the Manager, NPE on other correspondence. This action will be complete by January 31, 1991.

Our program for vendor interface and document control of technical information for safety-related equipment is being upgraded in accordance with our response to Generic Letter 90-03, "Vendor Interface for Safety-Related Components". Our response to Generic Letter 90-03, which was submitted on September 25, 1990, provides further details on these actions.

4. Date When Full Compliance Will Be Achieved:

Full compliance was achieved on June 2, 1990 when the Limitorque Maintenance Updates were formally placed into the OERP.