#### U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No.

50-344/90-28

Docket No.

50-344

License No.

NPF-1

Licensee:

Portland General Electric Company

121 S. W. Salmon Street Portland, Oregon 97204

Facility Name:

Trojan Nuclear Plant

Inspection at:

Rainier, Oregon

Inspection conducted: September 10-14, 1990

D. E. Corporandy, Reactor Inspector

D. L. Gamberoni, Reactor Inspector W. J. Wagner, Reactor Inspector

Approved by:

R. Huey, Engineering Section

# Inspection Summary:

Inspection During the Period September 10-14, 1990 (Report No. 50-344/90-28)

Areas Inspected: An unannounced routine inspection of praviously identified items was conducted by three regional inspectors. Inspection procedures 30703 and 92701 were used as guidance for the inspection.

# Results:

Significant Safety Matters: None

Summary of Violations: None

Open Items Summary: No new items were opened. One enforcement item and three open items were closed.

#### DETAILS

### 1. Persons Contacted

\*J. Cross, Vice President, Nuclear

\*W. Robinson, General Manager, Trojan Plant

\*T. Walt, General Manager, Technical Functions \*S. Bauer, Branch Manager, Nuclear Regulation

\*M. Schwartz, Manager, Technical Services

\*W. Williams, Compliance Engineer

\*S. Ford, Compliance Engineer \*D. Couch, Compliance Engineer

\*M. Morris, System Engineer

R. Nelson, Manager, Nuclear Safety and Regulation

J. Whelan, Manager, Maintenance

W. Nicholson, Branch Manager, Uperations

\*Attended the exit meeting on September 14, 1990.

# 2. Previously Identified Items (92701)

# a. (Closed) Followup Item No. 344/88-34-12: "Weaknesses in Generic Letter 86-10 Evaluations"

This item identified apparent weaknesses in the licensee's Generic Letter (GL) 86-10 evaluations performed to demonstrate compliance with 10 CFR 50 Appendix R. The licensee acknowledged these weaknesses and indicated that the following actions would be taken: (a) initiation and implementation of a procedure to standardize the quality and content of the evaluations, and (b) review the existing evaluations and strengthen where necessary.

The procedure initiated to ensure these evaluations are performed in compliance with GL 86-10 is contained in the Nuclear Plant Engineering (NPE) Civil Engineering Guide EG-019. EG-019, entitled "Evaluations of Passive Fire Protection Features," Revision 0, was approved on March 23, 1989. The responsibilities and the criteria for performance of evaluations are addressed covering both passive fire protection features and fire hazards analyses.

EG-019, Section 7.0 "Enhancements to Existing Evaluations" provides that existing evaluations and fire hazards analyses performed to meet the requirements of GL 86-10 shall be reviewed and enhanced, as appropriate. Where found to be applicable, the enhancements shall provide consideration of both fixed and transient combustibles for the potential effects of localized heating, and for other applicable considerations. As of this inspection one existing evaluation had been performed for an open pipe chase between fire areas A1 and A2 at elevation 5 feet in the Auxiliary Building. There were approximately 14 remaining evaluations still required to be updated. The licensee committed to provide the necessary resources

to complete updating the remaining evaluations by March 31, 1991. This item is being tracked on the Trojan Commitment Tracking List (CTL). Based upon the licensee actions taken to strengthen their GL 86-10 evaluations, this item is closed.

b. (Open) Unresolved Item No. 344/88-36-03: "Lack of Redundancy For Regulatory Guide (RG) 1.97 Instrumentation"

This item concerned lack of redundancy for certain RG 1.97 instrumentation (T-hot, T-cold and wide range steam generator level indication). In the current plant configuration a single failure of either vital instrument Bus Y11, or Y22, would result in a loss of indication for three of four loops for this instrumentation.

In Justification for Continued Operation 88-14, Revision 0, the licensee committed to evaluate design alternatives to resolve the lack of redundancy problem. This evaluation, completed on January 27, 1989, detailed four design alternatives. The licensee had not yet committed to implement the design alternative recommended in the evaluation which would replace the dual pen recorders with single-pen recorders, one for each variable, and supply each recorder with power from the proper channel.

This item remains open until an acceptable design alternative implementation commitment is made by the licensee.

c. (Closed) Notice Of Violation No. 344/89-13-01: "Failure to Issue Form 18C-10"

The licensee response to the subject violation was reviewed. The violation identified the licensee's failure to initiate a Form I&C-10 (as required by Trojan Maintenance Procedure MP2-0) when the Emergency Diesel Generator lube oil filter inlet temperature instrument (No. TI-3821X) failed its scheduled calibration test.

The licensee's response identified the reason for the violation as personnel error.

The following corrective actions were reviewed:

- a) Form I&C-10 was completed on 1/9/90 for the out-of-calibration instrument No. TI-3821X. Regarding the form I&C-10 investigation, the inspector observed the following:
  - (1) The primary purpose of Emergency Diesel Generator lube oil filter inlet temperature instrument No. TI-3821X is to provide temperature indications for trending.
  - (2) The normal temperatures which instrument No. TI-3821X monitors vary from 125°F to 190°F.
  - (3) The only out-of-tolerance point was at 110°F.
  - (4) At 110°F the out-of-tolerance calibration was 2°F.

- (5) Trojan also has a low temperature alarm for the Emergency Diesel Generator lube oil.
- b) Documentation was provided to show that a formal review of this event was included with discussions which took place during the I&C Maintenance Annual Training held on March 8 and 9, 1990.
- c) A review of Maintenance Procedure MP-2-0 requirements was included as part of the March 8 and 9, 1990 I & C Maintenance Annual Training meeting.

The Form I&C-10 investigation of the out-of-calibration condition appeared to be adequate, and the additional corrective actions provided reasonable assurance that future cases of out-of-calibration equipment will receive an appropriate Form I&C-10 investigation.

The inspector also noted that PGE Plant Systems Engineering has committed to perform an evaluation for increasing the acceptable tolerance of this temperature indicator to within the calibration capability of the instrument by September 30, 1990. The inspector noted that compliance with the requirements of Trojan Maintenance Procedure MP-2-0 was achieved on January 9, 1990 when Form I&C-10 was accomplished in accordance with the procedure instructions.

Based on the above licensee actions, this item is closed.

d. (Closed) Followup Item No. 344/90-20-04 "METS Training"

This item addresses the need to establish procedures and conduct training to ensure the proper implementation and use of the licensee's Maintenance Evaluation and Trending System (METS). The licensee has committed to do this and has placed this action item on their CTL, which shows a current due date of December 5, 1990.

This item is closed.

e. (Closed) Unresolved Item No. 344/90-20-10: "Fire Brigade Membership"

Corrective Action Report (CAR) C90-5120 dated May 7, 1990 described the lack of a licensed operator as a fire brigade leader or May 6, 1990. The concern of this unresolved item was that if there were not enough qualified individuals on site to make up a fire brigade, this could represent a reportable condition. Inspector discussions with the licensee revealed that the Control Room Log records for May 6, 1990, listed three individuals from Operations as designated members of the fire brigade, with the remaining two members having been designated by Security. The inspector verified that the five members were listed on the "Trojan Fire Brigade Roster" printed on April 3, 1990, and thus were active, qualified members of the fire

brigade on May 6, 1990 for the time in question. Therefore, the licensee was in compliance with Technical Specification 6.2.2.f requiring that a fire brigade of at least 5 members be maintained on site at all times.

This item is closed.

## 3. Exit Meeting (30703)

The inspectors met with the licensee management representatives denoted in paragraph 1 on September 14, 1990. The scope of the inspection and the inspectors' findings as described in this report were discussed.