



Portland General Electric Company

James E. Cross Vice President, Nuclear

December 10, 1990

Trojan Nuclear Plant
Docket 50-344
License NPF-1

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

Dear Sirs:

Reply to a Notice of Violation

Your letter of November 8, 1990 transmitted a Notice of Violation associated with Nuclear Regulatory Commission (NRC) Inspection Report 50-344/90-29. Attachment 1 to this letter contains Portland General Electric Company's response to the Notice of Violation.

Your letter also requested that our response address how Inservice Testing related Design Change Packages and Requests for Evaluations are being tracked and scheduled to ensure completion. Attachment 2 to this letter addresses your request.

Sincerely,

T. D. Walt 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. R. C. Barr
NRC Resident Inspector
Trojan Nuclear Plant

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REPLY TO NOTICE OF VIOLATION

Violation

During a Nuclear Regulatory Commission (NRC) inspection conducted from September 2, 1990 through October 6, 1990, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions", Title 10 of the Code of Federal Regulations, Part 2, Appendix C (1990), the violation is listed below:

Trojan Technical Specification 4.7.3.1.b states that: "The Component Cooling Water (CCW) system shall be demonstrated OPERABLE by verifying that each CCW pump is OPERABLE when tested pursuant to Specification 4.0.5."

Technical Specification 4.0.5 states, in part, that: "Inservice Inspection of American Society of Mechanical Engineers (ASME) Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code . . ."

Section IWP 4120 of the ASME Boiler and Pressure Vessel code states that the "Full scale range of each instrument shall be three times the reference value or less."

Contrary to the above on September 14, 1990, the B train CCW pump is an ASME Code Class 3 pump and the bearing temperature was taken with an instrument that was 0 to 500°F, which is more than three times the reference value of the bearing temperature.

This is a Severity Level V Violation.

Response

Portland General Electric Company (PGE) acknowledges the violation.

1. Reason for the Violation:

The reason for the violation was the surveillance procedure was inadequate. The administrative procedure that discusses the implementation of Inservice Testing (IST) for pumps and valves at the Trojan Nuclear Plant is Periodic Engineering Test (PET) 9-4, "Documentation of Inservice Testing Data for Pumps and Valves". This procedure includes both the instrument range requirement of ASME Section XI, Subsubarticle IWP-4120 and the accuracy requirements of Table-4110-1. The routine testing of specific safety-related pumps

at Trojan is detailed in Periodic Operating Tests (POTs). The accuracy and range requirements for portable instrumentation are not contained in the individual POTs. The individual POTs reference PET 9-4 for general requirements. Since this information was not restated in the pump-specific test procedure, an instrument was used that did not meet the ASME Section XI range requirements.

2. Corrective Actions Taken and Results Achieved:

The subject pump bearing temperature surveillance has been invalidated and will be rerun within the code required testing frequency with an instrument that meets the code requirements.

A specific temperature measuring instrument capable of achieving the code requirements for range and accuracy was designated and noted in the Operations Management Special Orders Notebook October 25, 1990 as the instrument to be used by Operations personnel on future ASME Section XI IST pump surveillances.

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

The procedures for performing the surveillance of bearing temperatures for pumps in the IST Program will be revised by January 18, 1991 to include the range requirements of IWP 4120 of Section XI of the ASME Boiler and Pressure Vessel Code.

General instrumentation requirements specifying instrument range and accuracy will be added to the Trojan Nuclear Plant Writer's Guide for surveillance procedures. This upgrade to the Writer's Guide will be completed by March 1, 1991.

The next scheduled session of operator retraining will include a module on instrument range and accuracy requirements for the IST Program. This training will be completed by January 22, 1991.

4. Date When Full Compliance Will Be Achieved:

Full compliance has been achieved by the dedication of a specific temperature measuring instrument for future IST Program pump surveillances.

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RESPONSE TO INSERVICE TESTING (IST)
TRACKING AND SCHEDULING CONCERNS

Inspection Report 90-29 also requested that the response to the Notice of Violation address how IST related Design Change Packages (DCPs) and Requests for Evaluation (RFEs) are being tracked and scheduled to ensure completion. This information is provided below. Since IST related changes are not differentiated for other changes, the description below applies to any proposed design change.

Tracking and Scheduling of DCPs to Ensure Completion

Trojan currently uses the following management tools to schedule and track DCPs: a request for a modification from the Plant may come in the form of an RFE, a memorandum, a Request for Design Change (RDC), or a Plant Modification Request. The request is evaluated, and if considered to be a potential design change is prioritized and scheduled by a management review group and included as a line item in the Trojan Five-Year Plan. If the item is a regulatory commitment, it is also tracked to completion on the Commitment Tracking List.

During the preliminary design, the DCP is placed upon a computerized schedule (denoted as the Level II Schedule) within the Nuclear Plant Engineering (NPE) organization for detailed planning and scheduling. The responsible action engineer assigned to the DCP tracks its progress. The progress of the DCP is also monitored by the Manager of NPE.

NPE also uses an RDC tracking log to periodically denote status of the RDC and its associated DCP(s).

RDC 85-057, DCP 3 (Addition of IST Flow Instrumentation for the Component Cooling Water System) was discussed in the inspection report as not being properly tracked and implemented. The design approach for DCP 3 had not been finalized and was still being evaluated, but was still included in the Five-Year Plan for completion in 1992.

Tracking and Scheduling of RFEs To Ensure Completion

When an RFE is initiated, a number and priority are assigned and the RFE is entered into a computer data base. RFEs currently receive one of three priorities: 7 days, 30 days, or routine. The RFE is assigned by a supervisor to the appropriate organization for evaluation. Recently a dedicated coordinator has been assigned to oversee the RFE Program. The RFE coordinator has revised the procedure for RFEs.

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Under the new procedure, which is in the review and approval process, the priorities will be changed to immediate or routine (assigned by the appropriate PSE supervisor based on Plant operability concerns and available resources). The responsibilities of the evaluators of RFEs will be expanded to include tracking of action items to completion. A revision to the computer data base is also planned to provide enhanced tracking and sorting capabilities that do not exist with the current program.

The objective of these changes is to correct deficiencies previously identified as weaknesses in the RFE process.

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