Bart D Witners Vice President

October 22, 1982

Trojan Nuclear Plant Docket 50-344 License NPF-1 License Change Application 52

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 Mr. Clark:

Residual Heat Removal Suction Valve Interlock

The purpose of this letter is to inform you of a change to the Trojan operating procedures for the Residual Heat Removal (RHR) System suction valves, MO-8701 and MO-8702. In response to your request for additional information dated January 10, 1977, regarding overpressure protection, we stated that the RHR System automatic close feature for Reactor Coolant System (RCS) pressure in excess of 600 psig was no longer used. The circuit breakers were racked out to prevent automatic closure of these valves. PGE has reevaluated the advisability of defeating this RHR protective function. As a result of this reevaluation, the defeat of the automatic closure feature for the RHR suction valves will no longer be employed to provide an overpressure relief path from the RCS. This decision was based on the following reasons:

- Racking out the circuit breakers defeats the feature which protects the RHR System from overpressurization.
- Racking out the circuit breakers results in a loss of valve position indication.
- 3) Location of the circuit breakers results in operator inconvenience and a significant time delay in restoring the operability of these valves from the control room.
- 4) Installation and operability of the Overpressure Mitigation System eliminates the necessity for the RHR System relief valve to respond to a primary pressure transient.

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Portland General Electric Company

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Should you have any questions regarding this information, please contact us.

Sincerely,

Bart D. Withers Vice President

Nuclear

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