



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 167 TO FACILITY OPERATING LICENSE NO. NPF-1

PORTLAND GENERAL ELECTRIC COMPANY

THE CITY OF EUGENE, OREGON

PACIFIC POWER AND LIGHT COMPANY

TROJAN NUCLEAR PLANT

DOCKET NO. 50-344

1.0 INTRODUCTION

By letter dated July 8, 1988, Portland General Electric Company (PGE, the licensee) submitted LCA-168 requesting amendment to Operating License NPF-1. This was followed by letter dated January 31, 1989, LCA-168, Revision 1, which superseded the July 8, 1988 request LCA-168. The proposed amendment incorporates various editorial corrections and clarifications into the Trojan Technical Specifications (TS), and includes changes in the Radioactive Gaseous Process and Effluent Monitoring Instrumentation requirements.

2.0 DISCUSSION AND EVALUATION

The changes requested in this amendment are mostly editorial corrections or removal of ambiguities for clarification; others are minor but more substantive changes to monitoring requirements.

1. The reference to TS 3.3.2.1 on pages 3/4 3-59 and 3/4 3-64 is correctly changed to TS 3.3.2. This is necessary because in previously-issued Amendment 131, TS 3.3.2.1 was renumbered 3.3.2, but changes to pages 3/4 4-59 and 3/4 3-64 were inadvertently not included in Amendment 131. This is an editorial correction, and is appropriate and acceptable.
2. In Table 3.3-13, footnote (a) is revised to clarify that two channels of the Waste Gas Holdup System (WGHS) oxygen monitor must be operable as indicated on panel C-151 and, to satisfy the requirement of TS 4.11.2.6.1 for continuous monitoring, an alarm must be operable in the control room. Footnote (a) to Table 3.3-13, Radioactive Gaseous Process and Effluent Monitoring Instrumentation, specifies that the two required WGHS oxygen monitor channels consist of the portion of the monitor from the sensing element to the indicator on panel C-151, which panel is not generally manned. Therefore, footnote (a) is revised to include a requirement for

the single alarm in the control room to provide for continuous monitoring of the WGHS oxygen monitors. This change is necessary to make the Table 3.3-13 requirements consistent with the requirements of TS 4.11.2.6.1, and is therefore, appropriate and is acceptable.

3. On pages 3/4 3-61, 3/4 3-65 and 3/4 3-67, changes are made to Tables 3.3-13, and 4.3-9. These tables are revised to make Containment Purge Noble Gas Monitors PRM-1C and PRM-1D separate entries and to apply the appropriate footnotes to PRM-1D. The rest of the Containment Purge Monitor entries are then renumbered accordingly.

Currently, Table 3.3-13 Item 3c.a, allows either PRM-1C or PRM-1D to satisfy the requirement for one Containment purge noble gas monitor. PRM-1C and PRM-1D do not have the same ranges. During normal purging, the noble gas activity level is in the PRM-1C range. This change will require PRM-1C to be operating for Containment purge, or Action 28 will be required. If PRM-1C is not on-scale, then PRM-1D is required to be operating or Action 28 will be required. This change makes the PRM-1C and PRM-1D requirements when they are performing their Containment purge monitoring function consistent with the requirements when they are performing their RCS leakage detection and Containment ventilation isolation monitoring functions. The remaining entries for Containment purge effluent monitoring are renumbered accordingly, and Table 4.3-9 is revised to keep the entries consistent with Table 3.3-13. In addition, PRM-1D has never had a check source, but instead has an installed keep-alive source which maintains the channel reading above zero. Application of footnote (a) in Table 4.3-9 clarifies this terminology. The TS also requires a channel functional test to verify that described automatic actions occur when the instrument indicates above the alarm trip setpoint. Reference to footnote (4) in Table 4.3-9 makes it clear that the alarm trip setpoint check is performed by reducing the alarm trip setpoint below the level of the keep-alive source. These changes are appropriate and are necessary to clarify the intention of the requirements, and are acceptable.

4. Page 3/4 3-61, Table 3.3-13, is corrected to change the Containment Purge Effluent Monitoring System flow rate measuring device from FR-3180 to FR-5600. This flow rate measuring device is incorrectly listed in Table 3.3-13 as FR-3190. This change correctly identifies the device number as FR-5600, and is acceptable.
5. Pages 3/4 3-62, Table 3.3-13, and 3/4 3-66, Table 4.3-9, are revised to add PRM-6B to the condenser air ejector noble gas monitor entries. There are two monitors for condenser air ejector noble gas monitoring, PRM-6A and PRM-6B. Currently, only PRM-6A is listed in Tables 3.3-13 and 4.3-9, Item 5.a. Either monitor PRM-6A or PRM-6B can be used to monitor condenser air ejector noble gas activity. This change will allow PRM-6B to be used to satisfy the channel operability requirement for condenser air ejector noble gas activity monitoring, and is acceptable.
6. Table 3.3-13 is revised to remove footnote (b). Table 3.3-13, footnote (b), specifies that the condenser air ejector monitoring requirements for

Items 5.b through 5.e are applicable after the moisture removal system is installed and operable for PRM-6. The PRM-6 moisture removal system is installed and operable and footnote (b) is no longer required. This is an editorial change, and is acceptable.

7. Page 3/4 3-66a, Table 4.3-9, is revised to delete the channel check requirement for the post-accident monitoring system Containment effluent, Auxiliary Building effluent, and condenser air-ejector effluent iodine samplers and replace this requirement with a monthly Channel Functional Test.

In accordance with note (3) of Table 4.3-9, the channel check requirement for the Containment effluent, Auxiliary Building and condenser air ejector iodine samplers (Table 4.3-9, Items 6.b, 6.d, and 6.f) consists of the verification of flow through the sampler. The post-accident iodine samplers do not normally have flow through them. Flow is lined up to the iodine samplers when the respective system is in the accident mode. The current channel check requires each system to be switched to the accident mode every shift. Such a surveillance is more appropriately performed as a Channel Functional Test since the function of the samplers is actually being tested. This change is appropriate, and is acceptable.

8. Page 3/4 3-66a, Table 4.3-9, is corrected to capitalize the "M" for the Item 6.e Channel Functional Test. This change corrects a typographical error, and is acceptable.
9. In Table 4.11-1, footnote "f" describes the principal gamma emitters and discusses their reporting. The previously-issued Amendment 99 inadvertently did not include this footnote with the principal gamma emitters entry for releases B.2, Oil Waste Separator Discharge, and B.3, Service Water System in Table 4.11-1. The addition of footnote "f" to Page 3/4 11-3 corrects this editorial error, and is acceptable.
10. Footnotes * and ** of Table 4.11-1 require grab samples to be taken of the associated release paths for compositing whenever activity exceeds 10^{-5} microCuries per milliliter ($\mu\text{Ci}/\text{ml}$). The purpose of compositing is to determine the release concentrations for radionuclides other than dissolved and entrained gases. Footnotes * and ** of Table 4.11-1 are revised to clarify that the 10^{-5} $\mu\text{Ci}/\text{ml}$ limit for taking samples for compositing excludes dissolved and entrained gases. The clarification is appropriate, and is acceptable.
11. A typographical error in Table 4.11-1 is corrected by changing 10^{-5} $\mu\text{Ci}/\text{ml}$ (in footnote **) to 10^{-5} $\mu\text{Ci}/\text{ml}$.
12. An editorial error in Table 4.11-2 is corrected by changing the footnote designation for Principle Gamma Emitters from "f" to "e." There is no footnote "f" associated with Table 4.11-2. This change is appropriate and acceptable.

13. Changes are made on pages 3/4 12-1, 3/4 12-8, and 6-17 to make the reporting required for unavailability of milk or fresh leafy vegetable samples, or a new land use census location, part of the Semiannual Radiological Effluent Release Report instead of a Special Report.

Paragraph "a." of the ACTION statement for Specification 3.12.1 requires a Special Report within 30 days of the end of the current semiannual period if milk or fresh leafy vegetables are unavailable from any of the required sample locations. A similar Special Report at the end of the current semiannual period is required by Specification 3.12.2 if a land use census identifies a location which yields a calculated dose or dose commitment greater than the location currently being used. Both of these conditions require a change to the Offsite Dose Calculation Manual (ODCM) and thus, the Special Reports duplicate the requirement of Specifications 6.9.1.5.4 and 6.15 that any change to the ODCM be reported in the Semiannual Radiological Effluent Release Report. Specification 6.9.2.q is also revised since there is no longer a Special Report associated with Specification 3.12.2. An editorial change has been made to Paragraph b of the Action Statement for Technical Specification 3.12.2 as the sentence did not make literal sense as written.

The changes in the reporting requirements are appropriate and are acceptable. The slight changes made for clarification are editorial in nature and are acceptable.

14. Changes are made on page 6-15c to properly refer to Section 6.14, Process Control Program (PCP) and Section 6.15, Offsite Dose Calculation Manual (ODCM). The Specification references in Section 6.9.1.5.4 for the PCP and ODCM were incorrect, and have properly been corrected by this change.

3.0 ENVIRONMENTAL CONSIDERATION

The amendment involves changes with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20, or changes a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

4.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will

be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Roby Bevan

Dated: December 18, 1990