

Bart D. Withers, Vice President

October 27, 1982

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington DC 20555

Dear Sir:

TROJAN NUCLEAR PLANT  
NRC Generic Letters 82-05 and 82-10,  
NUREG-0737, TMI-2 Action Item

A review of the schedular information provided in response to the subject NRC generic letters has identified various TMI Action Items for which there is a moderate to high probability that the schedules will have to be extended. The updated schedules are provided in Attachment 1 along with justifications for each extension.

In general, the longest extensions are due to poor vendor performance despite PGE's best efforts to expedite the design, fabrication, and delivery of the required equipment. In the case of Action Items II.F.1.1 and II.F.1.2, the revised date will provide PGE the flexibility to change equipment vendor in the event that a particularly troublesome vendor does not significantly improve his performance in the next few months. Other scheduled changes are based on past experience which indicates that time should be allowed in the schedule for observation and testing of equipment after installation, especially for equipment that was designed and fabricated in a relatively short time frame to meet the required deadlines. These extensions will allow us to fine tune the equipment and make minor design changes, as necessary, to improve the overall reliability and performance of the systems.

A046

Finally, we have identified the need to revisit earlier work performed in response to NUREG-0737 Item II.B.2 due to changes made to operating procedures in response to NUREG-0737 Item I.C.1.

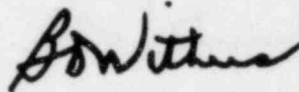
8211020232 821027  
PDR ADOCK 05000344  
P PDR

Portland General Electric Company

Mr. Darrell G. Eisenhut  
October 27, 1982  
Page two

We will continue to expedite matters under our control, especially for those items with the furthest installation dates, in order that reliable equipment can be installed as soon as possible.

Sincerely,



Bart D. Withers  
Vice President  
Nuclear

Attachment

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

Scheduled Changes for TMI Action Items  
Covered Under NRC Generic Letters 82-05 and 82-10

1) Item I.A.1.3 - Overtime Limits

A Plant procedure (Administrative Order A0-3-1) is currently in place to implement the NRC's overtime policy given in NRC Generic Letter 82-02 dated February 8, 1982. We have reviewed the slightly relaxed overtime policy given in NRC Generic Letter 82-12, (which will allow scheduling of overtime for the entire staff during periods of extended shutdown) and intend to revise the Plant procedure accordingly in a future revision to reflect this relaxation. However, since the current Plant procedure is more restrictive by not allowing the schedule of overtime for the entire plant staff at any time, it meets the requirements of Generic Letter 82-12. Therefore Item I.A.1.3 should be considered as being complete for Trojan.

2) Item II.B.1 - Reactor Coolant System Vents

The scheduled installation date for the reactor vessel head vent system has been changed to July 1, 1983, which is consistent with the recommended schedule given in NRC generic letter 82-10 (first refueling after July 1, 1982) and 10 CFR 50.44. Although installation of hardware is currently complete, the position of the manually operated root valve (Valve No. 8070) cannot be verified at this time. We plan to resolve this question during the next shutdown of sufficient duration which permits us to check the position of this valve which is located just above the reactor vessel head. This will ensure that the vent system is capable of being remotely operated from the control room as required by 10 CFR 50.44.

Although the reactor vessel head vent system will then be operable, the motor-operated isolation valve switches in the main control room will be tagged with a sign requiring shift supervisor's approval before actuation, as described in the PGE to NRC letter dated May 7, 1982; also, operating procedures for the head vent system will have an administrative hold pending NRC closeout of this item. This, in conjunction with the design features described in the PGE to NRC letters dated July 17, 1981 and May 7, 1982, will minimize the potential for an inadvertent operation of the vent system as required by NUREG-0737.

As described in the PGE to NRC letter dated January 2, 1980 (Item 2.1.a), the pressurizer power-operated relief valves (PORVs) provide venting capability of noncondensable gases from the pressurizer steam space. Any modifications necessary to meet the applicable portions of 10 CFR 50.44 will be scheduled for completion by the startup of Cycle 6, which is in conformance with the schedule given in 10 CFR 50.44.

3) Item II.B.2 - Plant Shielding and Environmental Qualification

As identified in the PGE to NRC letter dated April 28, 1982, the installation of hardware items in response to this item was completed prior to January 1, 1982. However, the emergency procedures are being completely rewritten based upon the Emergency Procedures Guideline developed by the Westinghouse Owners Group in response to NUREG-0737 Item I.C.1. We are now in the process of reviewing the changes made to date to our emergency procedures to determine the impact on previous assumptions made during the shielding and environmental qualification analysis performed in response to Item II.B.2. This review will determine the appropriate procedure modifications necessary to allow the performance of Plant operations consistent with these analyses. The reanalysis portion of this task for emergency procedures received to date is scheduled for completion by February 28, 1983, with modifications to these procedures being completed by April 16, 1983. We will also be reviewing the remaining emergency procedures being developed under Item I.C.1 as they become available to determine if any further modifications are necessary.

4) Item II.D.1 - Relief and Safety Valve Test Program

As indicated in our letter dated June 11, 1982, we plan to address the analysis of relief and safety valve qualification and qualification of downstream piping in one report. Due to the interaction of the valves and piping, their qualification cannot be addressed separately. PGE is currently working with our consultants to complete these analyses. However, we no longer expect to have this work completed by January 1, 1983 and have revised the date for submittal of the valve and piping qualification reports to the NRC to the startup of Cycle 6.

5) Item II.F.1.1 - High Range Effluent Radiation Monitors and II.F.1.2 Iodine and Particulate Monitors

By letter dated September 28, 1982, PGE informed the NRC that the main steam line radiation monitors were scheduled to be calibrated by November 1, 1982. The two monitors with failed power supplies discussed in this letter have been repaired by the equipment vendor and have been successfully calibrated onsite. However, the power supplies for the remaining two monitors have recently failed and they are being sent back to the supplier for repair. These monitors will be calibrated upon their return to Trojan. In light of problems experienced to date with this equipment, we believe it prudent to allow a period of time for observation and testing of these monitors to ascertain their reliability before declaring them operational. As a result, the scheduled operational date for these monitors has been changed to July 1, 1983. This schedule will also allow for minor design changes (if necessary) to be performed in order to improve the reliability of this system.

The remaining noble gas monitors under Item II.F.1.1 and the iodine and particulate monitors under Item II.F.1.2 are being manufactured by a different equipment vendor than the main steam line radiation monitors. Despite repeated and concerted efforts by PGE, including the threat of cancellation, the equipment vendor continues to slip delivery dates. In the PGE to NRC letter dated April 28, 1982, PGE stated that "Assuming equipment delivery in August 1982 and an estimated installation time of eight weeks, it is presently anticipated that the installation may be completed in 1982 . . . . Realistic allowances for further slippages beyond our control and allowances for installation and testing problems could defer complete installation until July 1, 1983." The August 1982 delivery date was not met by the equipment vendor. In fact, the latest "forecast" for equipment delivery is the first part of 1983. We have little confidence that this date will be met based on the number of missed commitments in the past by this vendor and based on the fact that part of the equipment is still in the design phase. Nevertheless, we will continue to expedite this matter with the goal of achieving equipment delivery as soon as possible. However, unless dramatic improvements are made by the equipment vendor during the next few months, we will be forced to cancel this contract and start over with a new vendor.

Regardless of whether or not the contract is cancelled, a schedule extension would be prudent. In the event that the contract is not cancelled, this extension should allow time for observation, testing, and design changes to make this system more reliable. It should be noted that a significant portion of the system is uniquely designed for Trojan with portions of the noble gas monitoring system required by Item II.F.1.1 being combined with part of the iodine and particulate monitoring system required by II.F.1.2. These unique design considerations have precluded use of generic systems such as those used at many other plants. This has had an impact on the schedule for Trojan and could have a future impact on the completion date if the contract is cancelled or if specific, unique problems are discovered during startup testing. As a result, the schedule is being changed to six months after successful receipt inspection of the equipment at Trojan, but not later than December 31, 1983.