

DEC 20 1990

Docket No. 50-344

Portland General Electric Company
121 S. W. Salmon Street
Portland, Oregon 97204

Attention: Mr. James E. Cross
Vice President, Nuclear

Gentlemen:

Thank you for your letter of October 26, 1990, in response to our Notice of Violation and Inspection Report No. 50-344/90-24, dated September 27, 1990, informing us of the steps you have taken to correct the items which we brought to your attention. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

S. A. Richards, Chief
Reactor Projects Branch

bcc w/copy of letter 10/26/90:
docket file
State of Oregon
A. Johnson
G. Cook
B. Faulkenberry
J. Martin
Resident Inspector
Project Inspector
J. Zollicoffer
M. Smith

REGION V/dot

12/20/90

SARichards
12/20/90

COPY	REQUEST COPY
NO	YES / NO

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YES / NO

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Portland General Electric Company

James E. Cross Vice President, Nuclear

October 26, 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 (NOV)

Your letter of September 27, 1990 transmitted a NOV pertaining to "Availability of Emergency Procedures at Local Control Stations", identified during the in-Plant portion of the July 1990 Operator Licensing Examination. Attachment 1 provides our response to the NOV.

Sincerely,

James 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

Dupe of

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3 pp.

Following completion of this review, additional procedures will be distributed to appropriate Plant locations if required. These reviews will be completed by November 12, 1990.

- B. Nuclear Division Procedure (NDP) 100-1, "Preparation, Issuance, and Revision of Nuclear Division Procedures" and Administrative Order AO 4-4 "Procedures, Revisions to Procedures, Deletions, Corrections, and Temporary Change Notices" or future Trojan Plant Procedure TPP 12-04, "Nuclear Division Administrative Control", will be revised or written as necessary to ensure that consideration is given to changing the existing distribution of procedures when significant revisions are made or when new procedures are written to support modifications made to the Plant. This revision will be completed by February 28, 1991.
- C. A procedure will be developed that formalizes general criteria for procedure distribution in the Plant and provides for a periodic review of procedure distribution that ensures current Plant needs are met. This procedure will be completed by February 28, 1991.

4. Date When Full Compliance Will Be Achieved:

Full compliance will be achieved by February 28, 1991, when the above actions are completed.

REPLY TO NOTICE OF VIOLATION (NOV)

Violation

Title 10, of the Code of Federal Regulations, Part 50 (10 CFR 50), Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants", Criterion VI, "Document Control", states in part, "Measures shall be established to control the issuance of documents, such as instruments, procedures, and drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

Contrary to the above, the Trojan Quality Assurance Program, Revision 11, Section 6.0, "Document Control", on September 1, 1990 did not establish measures to assure procedures are distributed to the locations where prescribed activities are performed. Examples included: the absence from the Remote Shutdown Station of procedures ECA 0.0, Revision 5, "Loss of All AC Power" and ECA 0.1, Revision 3, "Recovery From Loss of All AC Power Without Safety Injection," where loss of AC power and recovery from loss of AC power without safety injection is performed, and the absence from the local hydrogen analyzer control station of procedure, Operating Instruction (OI) 11-9, Revision 6, "Post Accident Hydrogen Analyzer Operation", where operation of the hydrogen analyzer is performed.

Response

1. Reason For The Violation:

The root cause of this violation is lack of administrative controls to ensure that procedures are adequately distributed in the Plant.

2. Corrective Steps That Have Been Taken and the Results Achieved:

A detailed review of operations procedures needed for off-normal and emergency events was conducted to determine which additional procedures should be distributed to appropriate Plant locations to facilitate availability during emergency or off-normal events. This review resulted in the placement of additional Plant procedures in various Plant locations.

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

A. Each Plant department will review current procedure distribution related to their discipline to determine if distribution of additional procedures is necessary to support that department's needs, particularly regarding procedures that need to be staged in the field to address abnormal or emergency situations.