



Portland General Electric Company

December 31, 1990

James E. Cross Vice President, Nuclear

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

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

Dear Sirs:

Portland General Electric Company (PGE)  
Commitment Regarding Generic Letter 83-28

By letter dated October 31, 1989, PGE responded to a request for additional information regarding Nuclear Regulatory Commission Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events". The October 31, 1989 letter committed PGE to complete an action concerning the Safety-Related List by December 31, 1990. The attachment to this letter describes the actions PGE is taking in regard to this commitment.

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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PORTLAND GENERAL ELECTRIC COMPANY (PGE)  
COMMITMENT REGARDING GENERIC LETTER 83-28

Background

By letter dated November 4, 1983 PGE provided a response to Generic Letter (GL) 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events". On September 8, 1989 the NRC requested additional information with regard to Item 2.2.1 of GL 83-28.

PGE's response to the request for additional information was submitted on October 31, 1989. The response included a commitment to conform subordinate documents which provide safety-related component classifications to a key document, specifically the Safety-Related List. PGE committed to complete this commitment by December 31, 1990.

Actions Taken

PGE has determined that an item-by-item comparison of the equipment listed in subordinate documents with that listed in the Safety-Related List will not be performed since it would be extremely time- and resource-intensive and would duplicate programs currently in place or planned. However, the following actions have been taken as interim measures to conform the subordinate documents to the Safety-Related List:

1. The primary subordinate documents utilized for component identification and/or classification were identified.
2. A directive was issued to Plant managers and supervisors stating that the Safety-Related List has definitive authority over all other equipment lists and that differences in component identification or classification will be resolved through the governing procedure for the Safety-Related List.
3. A cautionary note stating the Safety-Related List has definitive authority over all other equipment lists with regard to safety classification of components was distributed to Nuclear Division personnel for insertion in the subordinate documents in their possession.
4. Procedures governing component procurement and installation have been revised to help ensure the Safety-Related List is consulted in determining the safety-related classification of components.

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Attachment  
Page 2 of 2

As a permanent solution, PGE has embarked on a 2- to 3-year project to design and implement a Master Equipment List (MEL) which would encompass all currently existing equipment lists and provide a single source document for determination of all equipment/component requirements. In the interim until the MEL is determined to be complete and functional, the Safety-Related List will remain the definitive authority over all other equipment lists in determining the safety classification of components.

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