



Portland General Electric Company

James E. Cross Vice President, Nuclear

December 28, 1990

Trojan Nuclear Plant
Docket 50-344
License NPF-1

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

Dear Sirs:

Pipe Whip Restraint Design Verification Program

By letter dated January 20, 1989, "Design Verification Programs", Portland General Electric Company (PGE) reported the results of three comprehensive programs that were undertaken in response to design concerns identified at Trojan during the 1987 Refueling Outage. One of those programs was the Pipe Whip Restraint Design Verification Program. In regard to that program, the letter noted an outstanding item which is the completion of a leak-before-break (LBB) analysis to justify the elimination of certain pipe whip restraints. PGE committed to submit the analysis for your approval in 1990.

During 1989 and 1990, proposals from vendors to perform the LBB analysis were obtained and analyzed; a vendor was chosen and contracted to perform the analysis; necessary archival construction records were identified, retrieved, and transmitted to the vendor; and the analysis was started. The analysis has not been completed, however, due to extended lengths of time required to complete each of the above activities. Additionally, for pipe whip restraints associated with 4-inch piping, a feasibility study for the application of LBB analysis is being performed. Based on the results of that study, a decision will be made whether to continue to pursue an LBB analysis for the 4-inch piping or to resolve the design concerns of pipe whip restraints associated with these lines by another means. The results of the feasibility study and a draft report of the LBB analysis are

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expected to be available for PGE's review by April 1991. By June 30, 1991, the final LBB report and a plan and schedule for resolving concerns with the pipe whip restraints associated with 4-inch piping will be provided to the Nuclear Regulatory Commission.

Sincerely,



T. D. Walt for J. E. Cross

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