

NOV 10 1982

Docket File
DCS MS-016

Docket No. 50-344

Mr. Bart D. Withers
Vice President Nuclear
Portland General Electric Company
121 S.W. Salmon Street
Portland, Oregon 97204

Dear Mr. Withers:

The Commission has issued the enclosed Amendment No. 77 to Facility Operating License No. NPF-1 for the Trojan Nuclear Plant. The amendment consists of changes to the Technical Specifications in response to your application dated May 6, 1982.

The amendment requires that (1) the containment purge and hydrogen vent containment isolation valves be tested for proper closure on a containment high radiation signal once per 18 months, (2) the hydrogen vent containment isolation valves be similarly tested for proper closure on a containment ventilation isolation signal, (3) the containment purge valves be locked closed and verified to be locked closed every 31 days when the plant is not in a refueling or cold shutdown condition, (4) the containment purge valves be leak tested every nine months and each time before leaving the cold shutdown condition if opened (prior to power operation), and (5) the hydrogen vent valves be normally closed and opened only when necessary for safety reasons. In addition, the amendment adds several new containment sample isolation valves to the list of containment isolation valves thereby subjecting them to operability and testing requirements.

The issuance of the enclosed amendment marks substantial progress in resolving two generic issues for the Trojan Nuclear Plant: Containment Purging and Venting, and Item II.E.4.2 of NUREG-0737, Containment Isolation Dependability. Following the format of our status letter on these issues of December 4, 1981, the current status of each is again presented below, together with our basis for accepting the enclosed technical specification changes and related matters.

1. NRC 7-28-81 Letter, Item i: Conformance to SRP Section 6.2.4 Rev. 1 and RTP CSB 6-4 Rev. 1

Our Safety Evaluation Report enclosed with our December 4, 1981 letter identified only two remaining actions needed to complete this item: (1) technical specifications to require that the containment purge valves be locked closed (and verified locked closed each 31 days) in Operational Modes 1 through 4, and (2) technical specifications to require that the hydrogen vent valves be normally closed and opened only when necessary for safety reasons. The enclosed amendment contains these provisions, and therefore this item is completely resolved.

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2. NRC 7-28-81 Letter, Item 2: Valve Operability

- a. Purge Valves. The enclosed amendment requires that these valves be locked closed in Modes 1-4, consistent with our Safety Evaluation of December 4, 1981.
- b. Hydrogen Vent Valves. PGE is maintaining its commitment to limit opening of the vent exhaust valves to no more than 50° open until replaced with new valves qualified per the guidelines for valve operability contained in our letter of September 27, 1979 (PGE letter dated February 12, 1982). In addition, the hydrogen vent supply valves will be maintained shut with power supplies removed during Modes 1 through 4, until replaced with qualified valves as above (PGE letter dated May 6, 1982).

Your letter of February 12, 1982 states that qualification data for new valves are scheduled to be submitted by December 30, 1982. These valves will be replaced with fully qualified valves during the 1983 refueling outage, as stated in your May 6, 1982 letter.

These commitments acceptably resolve the valve operability issue as an interim measure pending our acceptance of the qualification of the replacement valves. This item will remain open until that time.

3. NRC 7-28-81 Letter, Item 3: Safety Actuation System Signal Override.

We are currently reviewing your letter of March 12, 1982 regarding this item. The results of our review will be reported later.

4. NRC 7-28-81 Letter, Item 4: Containment Leakage due to Seal Deterioration

- a. Purge Valves. The enclosed technical specifications require that the containment purge valves be leak tested every nine months and prior to every entry into Mode 4 if the valves have been opened in Modes 5 or 6. The valves are not to be opened after final leak testing while in Modes 1-4.

Proof-testing before entering Mode 4 will ensure that the valves are leak-tight before entering an extended operating period. This, coupled with the requirement to leave the valves undisturbed after final testing and testing every nine months, will provide a high degree of assurance of leak-tightness during operation (Modes 1-4). Since the valves are required to be

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left closed after testing, the valves will not be subject to seal wear during operation. Also, since the valves are located inside buildings with a controlled atmosphere, seal deterioration due to temperature extremes should not occur. Operating experience at Trojan since 1976 shows that the plant averages two cold shutdowns per year. Therefore the valves will be tested frequently. This is acceptable.

- b. Hydrogen Vent Valves. Since PGE is going to replace the existing hydrogen vent valves at the next refueling outage (spring, 1983) with valves with non-resilient seats, no technical specification changes for more frequent leak testing were proposed.

However, these valves were tested per the requirements of 10 CFR 50, Appendix J, during the spring, 1982 refueling outage. Further, the supply valves will be closed (with power removed from the motor operators) and not opened in Modes 1-4. In addition, PGE has committed to test the exhaust valves prior to each entry into Mode 4 from a cold shutdown condition (if not tested in the previous 6 months) and every 6 months thereafter until they are replaced with valves having non-resilient seats.

This is acceptable interim action until the valves are replaced. This item is therefore resolved.

5. NUREG-0737, II.E.4.2, Containment Isolation Dependability

Items 1-4, Implement Diverse Isolation.

These items are resolved, as documented in our letter of April 23, 1980.

Item 5, Containment Pressure Setpoint.

Resolved with the issuance of Amendment No. 68 on November 24, 1981.

Item 6, Containment Purge Valves.

Resolved. See item 1 above.

Item 7, Radiation Signal on Purge Valves.

The Trojan design has been modified to cause closure of both the containment purge valves and hydrogen vent valves on a containment high radiation signal and on containment ventilation isolation.

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The enclosed technical specifications require that these functions be operable and be tested once per 18 months. This is acceptable and resolves this item.

Item 8, Technical Specifications.

This item was resolved with the issuance of the Category "A" Lessons-Learned Technical Specification, Amendment No. 56, on 1-21-81.

6. Other Matters

PGE has added three new containment isolation valves to the containment atmosphere sample lines in response to NUREG-0737, Item II.F.1.6, Containment Hydrogen Monitoring. The enclosed technical specifications therefore update Table 3.6-1, Containment Isolation Valves, to include these new valves, thereby subjecting them to operability and surveillance requirements consistent with other containment isolation valves. These changes are therefore acceptable.

Finally, you have proposed to add a + 10% tolerance to the required flowrate for the hydrogen mixing system. As discussed with members of your staff, this is not necessary, as the current minimum value is intended to be an indicated instrument reading. It is recognized that some instrument error may exist. Based on this clarification, your staff agreed that the change is not needed.

7. Conclusion

We have determined that the amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR §51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated, does not create the possibility of an accident of a type different from any evaluated previously, and does not involve a significant reduction in a margin of safety, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the

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proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

A copy of the Notice of Issuance is also enclosed.

Sincerely,

Original signed by

Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

Enclosures:

- 1. Amendment No. 77 to NPF-1
- 2. Notice of Issuance

cc w/enclosures:
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Mr. Bart D. Withers

- 5 -

regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

A copy of the Notice of Issuance is also enclosed.

Sincerely,

Robert A. Clark, Chief
Operating Reactors Branch #3
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Other: Amendment No. 77
Referenced documents have been provided PDR.

Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure:
As Stated

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Portland General Electric Company

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